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October 18, 2002

VIA FIRST CLASS MAIL

Mr. Bernard Schorle (HSRL-6) Waste Management Division U. S. EPA Region V 77 West Jackson Blvd. Chicago, IL 60604

Subject:

Report of Water Quality Conditions, Second Quarter 2002

Marion (Bragg) Landfill, Marion, Indiana

Dear Mr. Schorle:

On behalf of the Marion (Bragg) Group, please find enclosed three (3) copies of the Report of Water Quality Conditions for the second quarter of 2002, prepared by O&M, Inc., for the subject site.

Please contact me at (630) 443-1940 with any questions on the enclosed reports.

Sincerely,

de maximis, inc.

Gary E. Parker

Enclosures

cc: Resa Ramsey, IDEM (cover plus one copy)

John Hanson, Esq., Beveridge & Diamond, P.C. (cover plus one copy)

Rick Meyers, United Technologies (cover plus one copy)

Dan Garrigan, O&M Inc. (cover via facsimile only)

FILE: 3004-18\2ndqrt_2002rpt.doc

REPORT OF

WATER QUALITY CONDITIONS SECOND QUARTER 2002 MARION (BRAGG) LANDFILL

MARION, INDIANA

Prepared on Behalf of:

MARION (BRAGG) LANDFILL GROUP

Prepared by:

O & M, Inc. 303 N. Indiana St. Danville, IN 46122

October 2002

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TABLE OF CONTENTS

			PAGE
1.0	INTRODUCTION	ON	1
2.0	SITE CONDIT	IONS	2
3.0	COMMENTS.		3
		LIST OF FIGURES	
FIGUR	E 1	Site Location	
FIGUR	E 2	Ground Water Sampling Locations	
FIGUR	E 3	Ground Water Contour Map	
FIGUR	E 4	Hydrograph for Off-site Monitoring Wells	
FIGUR	E 5	Hydrograph for Shallow, Upper Aquifer Monitoring Wells	
FIGUR	E 6	Hydrograph for Deep, Upper Aquifer Monitoring Wells	
FIGUR	E 7	Hydrograph for Surface Water Monitoring Locations	

LIST OF TABLES

	TABLE 1	Sample Summary Matrix
	TABLE 2	Water Level and Methane Monitoring Data
_	TABLE 3	Field Water Quality Measurements Conducted During Well Purging
_	TABLE 4	Data Qualifier Definitions
	TABLE 5	Sample Designation Key
	TABLE 6	Groundwater Chemistry Data
-	TABLE 7	Water Quality Criteria
_	TABLE 8	Calculated Acute Aquatic Criteria and Chronic Aquatic Criteria for Ammonia-Nitrogen
_	TABLE 9	Sampling Locations Exceeding Applicable Water Quality Criteria

LIST OF APPENDICES

APPENDIX A. Chain-of-Custody Forms

APPENDIX B. Trillium, Inc. Data Validation Reports

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1.0 INTRODUCTION

This report presents water level data, field water quality measurements, and results of laboratory analyses for water samples collected at the Marion (Bragg) Landfill site during the quarterly monitoring event conducted in June 2002.

The sampling program consisted of sampling the on-site monitoring wells for the project specific indicator parameters: total suspended solids (TSS), ammonia-nitrogen (NH₃-N), chemical oxygen demand (COD), and chlorides (Cl⁻). The monitoring program was designed to document the effectiveness of the landfill cap and is described in detail in the Remedial Action Plan (RAP) (Environmental Resources Management (ERM), 1989, Remedial Action Plan, Marion (Bragg) Landfill Site, Marion, Indiana) and Remedial Design/Remedial Action (RD/RA) Work Plan (Environmental Resources Management, 1989, Remedial Design/Remedial Action Work Plan, Marion (Bragg) Landfill Site, Marion, Indiana). Sampling locations MB-3 and MB-4 have been removed from the water quality-monitoring program as part of a condensed monitoring program following a no-further-action Record of Decision.

Water quality sampling at the Marion (Bragg) Landfill for the referenced period was performed June 13, 2002. All sampling and analysis were conducted in accordance with the requirements specified in the RD/RA Work Plan (ERM, 1989) and Quality Assurance Project Plan (ERM, 1990, Quality Assurance Project Plan, Remedial Design/Remedial Action, Monitoring and Additional Studies at the Marion (Bragg) Landfill Site, Marion, Indiana). Copies of the chain-of-custody forms are included in Appendix A and the data validation report is included in Appendix B. Detailed review of analytical data is presented in the data validation reports.

2.0 SITE CONDITIONS

Sampling event data is presented in attached Tables 1 through 9 and Figures 1 through 7. Review of that data indicates:

- The interpreted groundwater flow directions are the same as presented in previous reports.
- Monitoring well 8 (MW-8) was not measured due to obstruction in well.
- No methane was detected at any site monitoring locations.
- All of the water samples, collected from on-site monitoring wells
 during the June 2002 sampling event, contained detectable levels of
 at least one of the indicator parameters of NH₃-N, COD, Cl⁻, and TSS
 above the levels measured in the upgradient background monitoring
 well (MB-10) with the exception MB-1, which did not have any
 indicator parameters levels above the background monitoring well.
- Calculated concentrations of un-ionized ammonia did not exceed the acute aquatic criteria (AAC) at any sample location.
- Calculated concentrations of un-ionized ammonia exceeded the chronic aquatic criteria (CAC) at downgradient locations MB-2, MB-6, MB-7, and MB-8. However, after performance of the mixing calculations for the river, the calculated NH₃-N concentrations no longer exceeded the criteria.

3.0 COMMENTS

Further discussion of each comment can be noted in the data validation reports found in Appendix B.

FIGURES

Figure 1 Site Location
Marion (Bragg) Landfill

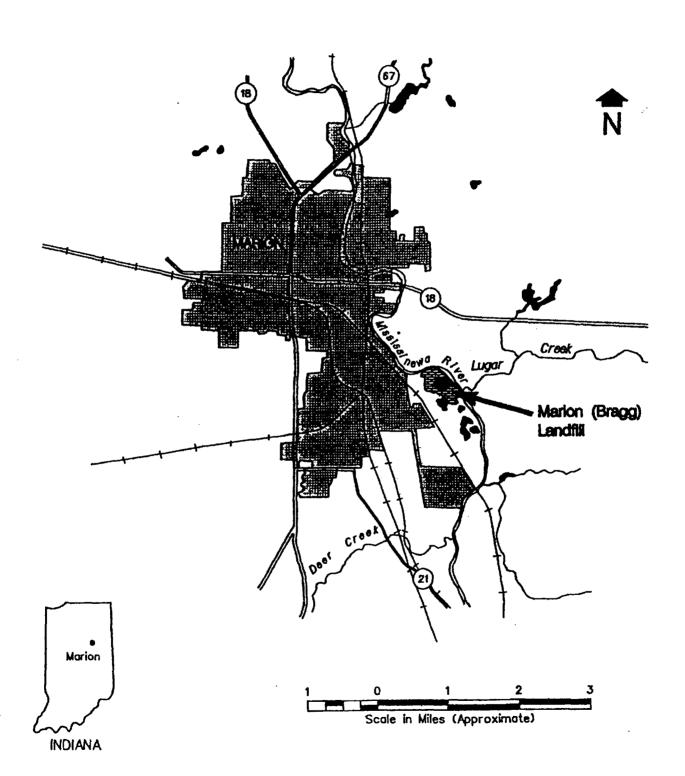


Figure 2 Sampling Locations Marion (Bragg) Landfill

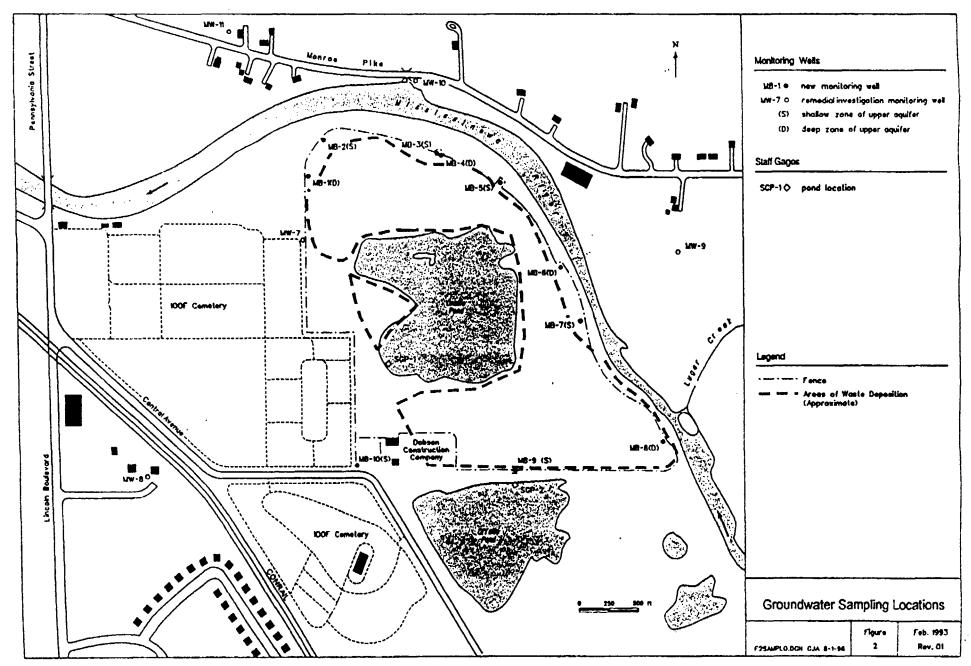
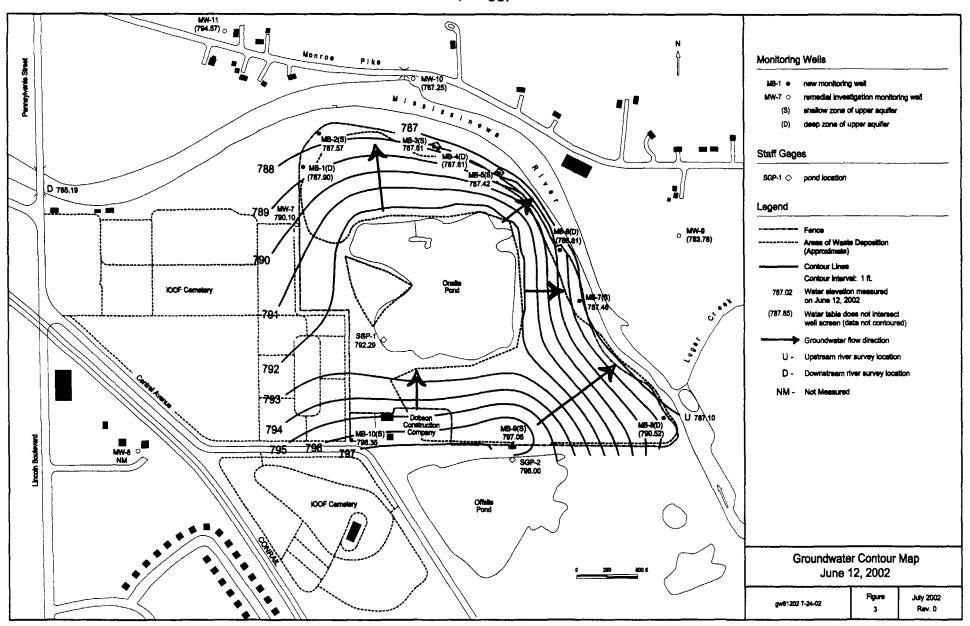
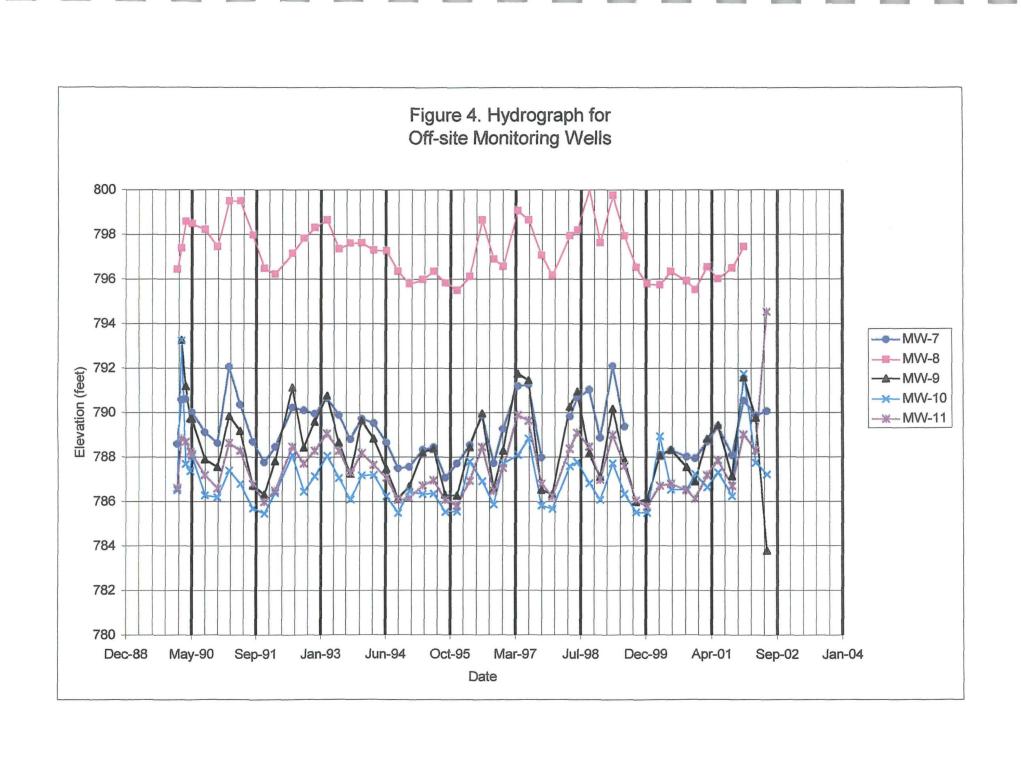
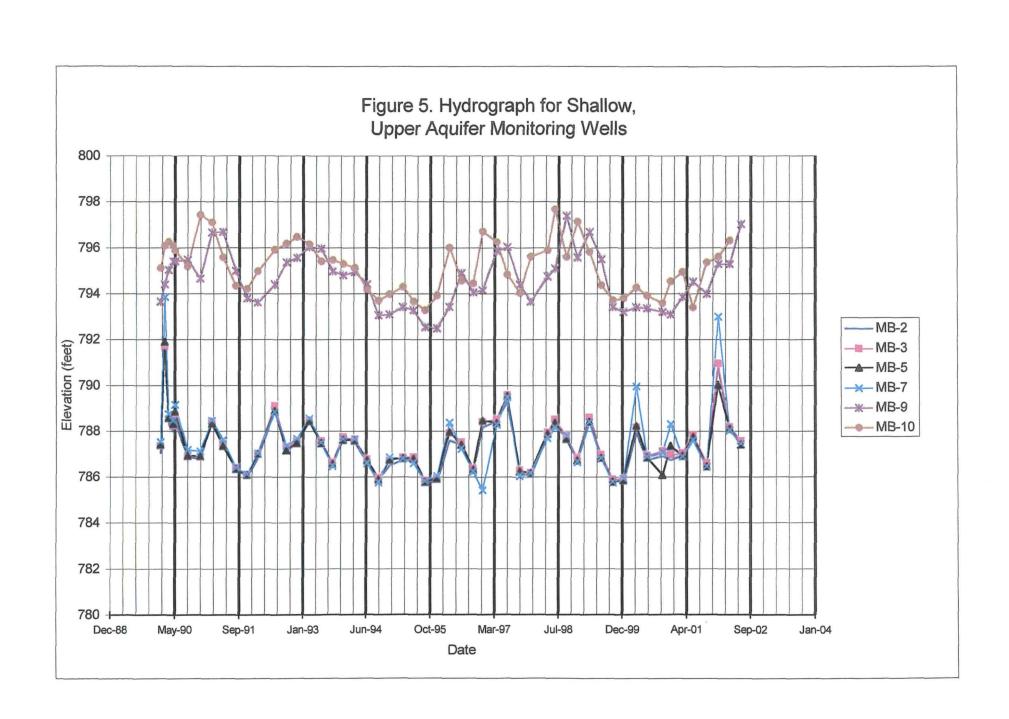
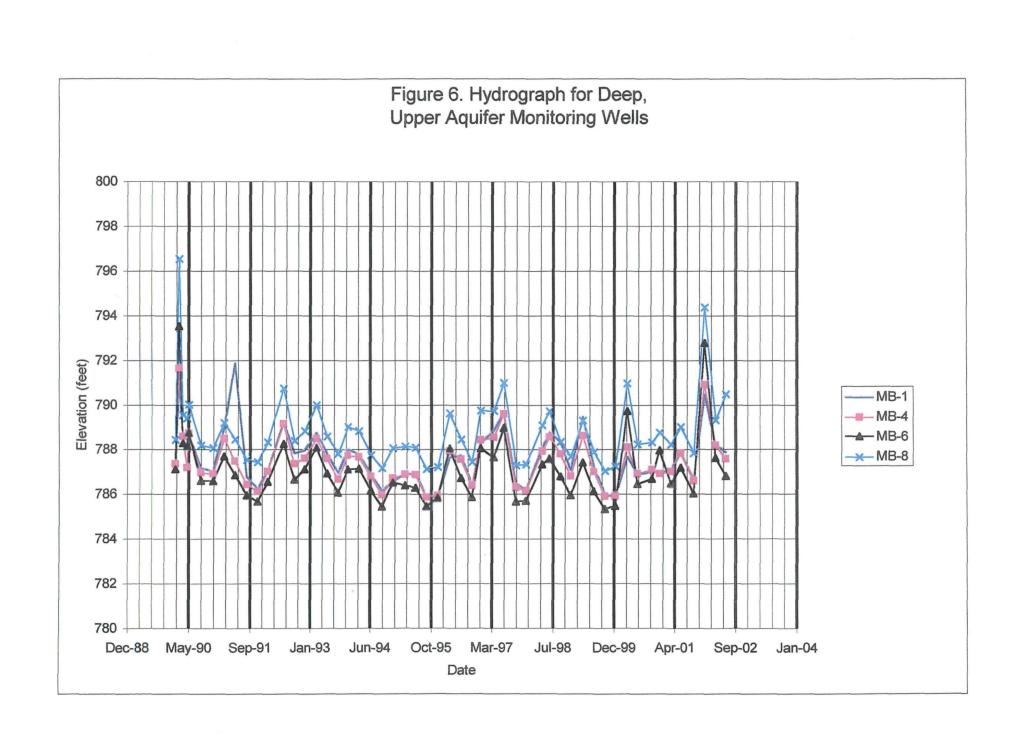


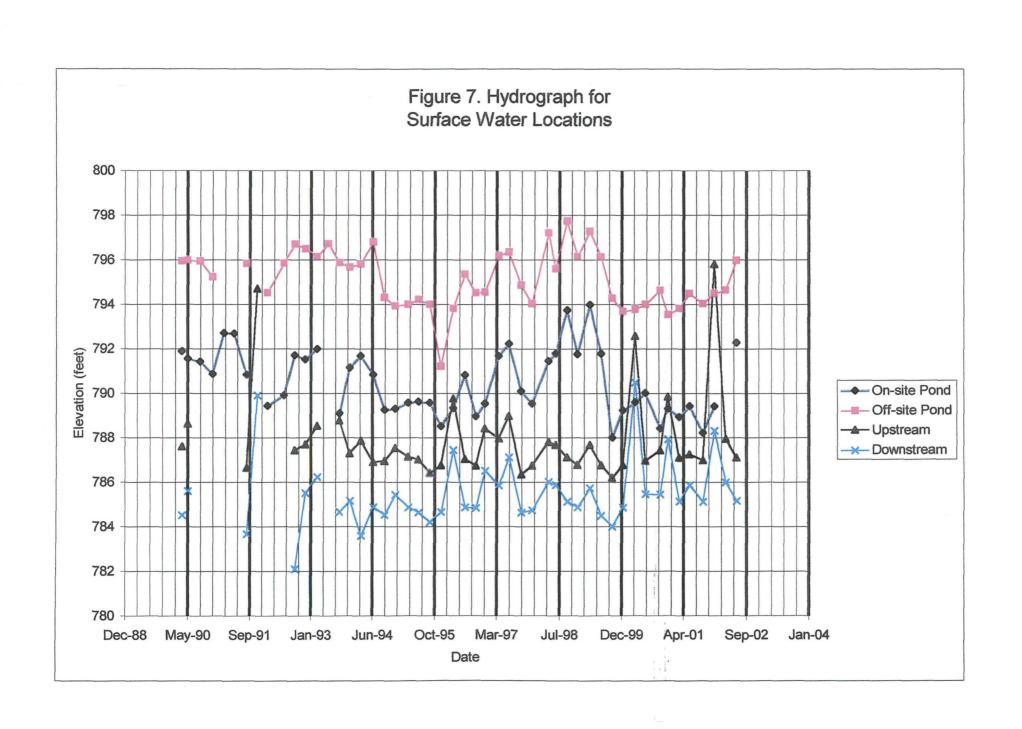
Figure 3 Groundwater Contour Map Marion (Bragg) Landfill











TABLES

Table 1
SAMPLE SUMMARY MATRIX - MARION (BRAGG) LANDFILL

Matrix	Number of Samples	Number of Trip Blanks*	Number of Field Blanks*	Number of Field Duplicates	Number of Matrix Spike/ Matrix Spike Duplicate Samples **	Total Matrix	Analyses	Container and Preservation	Holding Time
Menta	Samples	Dia iks	Dia No	Dupilcales	Spike Dupicate Samples	I OLD I MICK ! IX	LABORATORY	Freedvacci	Holding Times
GROUND WATER	8 (Note 1)		1	1	2	12	TSS	1-1L plastic	3 days
(Quarters between the semi-anni								Cool to 4C	
sampling when only the IDEM Pa	rameter						Chloride	1-250ml plastic	28 days
s to be sampled.)								Cool to 4C	
							NH3-N	1-1L plastic	28 days
1								H2SO4 to pH	
1								less than 2.	
							COD	1-250ml plastic	28 days
								H2SO4 to pH	
 								less than 2.	
							FIELD		
							pH, Conductivity,	Measure in field	
							D.O. and Temp.	immediately after	
								collection.	
									

Note 1: Wells MB-3 and MB-4 were not sampled this quarter as part of an interim reduced monitored program following a "No further action" ROD.

- * Trip blanks are required for volatile organic analysis at a frequency of one per cooler shipped containing volatile organic analysis.
- ** Triple the volume for groundwater and surface water locations will be collected for matrix spike/matrix spike duplicate analyses at a frequency of one per 20 investigative samples. Inorganic analyses will include a single matrix spike and a laboratory duplicate vs. matrix spike duplicate.

TABLE 2: WATER LEVEL AND METHANE MONITORING DATA, MARION (BRAGG) LANDFILL, JUNE 12, 2002

	Top of		Ground			-	
	Casing		Surface	Methane	Water	Water	
	Elevation	Stickup	Elevation	Concentration	Level	Elevation	
Monitoring Location	(ftamai)	(ft)	(flamsi)	(%)	(fotoc)	(fismsi)	
MB-1	799,57	2.50	797.07	0.0	11.67		787.9
MB-2	801,75	2.80	798.96	0.0	14.18		787.5
MB-3	806.15	2.70	803.45	0.0	18,54		767.5
MB-4	805,96	2.80	803.38	0.0	18.35		787.6
MB-6	808.87	3.00	803.87	0.0	19.45		787.4
MB-6	803.58	3.50	800.00	0.0	16.77		786.8
MB-7	812,73	3.00	809.73	0.0	25.27		787.4
MB-8	810.73	3.00	807.73	0.0	20.21		790.5
MB-0	814,73	2.80	811.93	0.0	17.86		797.0
MB-10	822,36	3,10	819.28	0.0	26.00		796.3
MW-7	802,36	2.82	790.54	0.0	12,26		790.1
MW-8	810.87	3.06	807.79	NW NW	l NM		
MAY-9	806.04	2.57	803.47	0.0	22,26		783.7
MW-10	803,17	2.27	800.90	0.0	15.92		787.2
MW-11	811.09	2.83	808.26	0.0	18.52		794.5
Staff Gauges	Elev. at the 0 mark	on the staff cause			Negarment of w	rater level on staff sausse (4)	
SGP-1 (4)	791,17	NA	NA	. Nev	1.12		792.2
	Top of Staff Gauss	<u>Hisystion</u>			Distance Below T	op of Maff Gauss (1)	
9GP-2	796,16	NA	NA	Nev Nev	2.16		796.0
River Revetion	Benchmark Blevet	29			Surveyed Distance	4	
Upstream location (2)	810.73	NA	NA	. NIN	23.63		787.1
Downstream location (3)	796,94	NA	NA	New New	11.75		785.1

Notes: Stickup

- Measured distance between the ground surface and the top of casing

fternel ftbtoc

- feet above mean sea level
- feet below top of casing. For staff gauges, valve presented is messurement (in feet) below level of staff gauge.
- (1) Pond water level measured from surveyed top of staff gauge down to pond water.
- (2) Elevations determined by surveying to known benchmark elevations; benchmark for upstream location MB-8 top of casing.
- (3) Elevations determined by surveying to known benchmark elevations; benchmark for downstream location is concrete spillway on east side of McFeeley Bridge.
- (4) O&M Inc. reinstalled and resurveyed during the second quarter sampling event.
- SGP-1 On-Site Pond SGP-2 - Off-Site Pond NM - Not Messured

NA - Not Applicable

TABLE 3: FIELD WATER QUALITY MEASUREMENTS CONDUCTED DURING WELL PURGING, JUNE 2002

Well I.D.	Total Depth (ft)	Approx Stickup (ft)	Depth to Water (fibtoc)	Casing Volume (gal)	Date	Volume Pumped (gal)	pH	Temp (C)	Specific Conductance (umhos/cm) (1)	Specific Conductance (umhos/cm) (2)	Dissolved Oxygen (mg/L)	Conversion Factor (K)
MB-1	37	2.50	11.67	4.10	06/13/02							
						12.5	7.1	14.5	650	815	3.6	0.99
						13.0	7.2	15.0	650	804	3.9	0.99
						13.5	7.3	15.0	650	804	3.4	0.99
MB-2	18	2.80	14,18	0.62	06/13/02							
						2.0	6.7	15.0	810	1002	2.4	0.99
						2.5	6.8	14.0	800	1015	2.6	0.99
						3.0	6.8	14.0	810	1028	2.4	0.99
MB-3	24	2.70	18.54	0.88		(Well removed f no-further-action F			oring program as part of a	condensed monitoring	program followi	no
MB-4	35	2.60	18.35	2.70		(Weii removed f no-further-action F			oring program as part of a 1.)	condensed monitoring	program followi	no
MB-5	24	3.00	19.45	0.74	06/13/02							
						2.5	7.0	15.0	1000	1238	2.6	0.99
						3.0	7.0	15.0	1050	1299	2.6	0.99
						3.5	7.0	15.0	1000	1238	2.5	0.99
MB-6	28	3.50	16.77	1.82	06/13/02							
						5.5	6.6	15.5	810	990	1.2	0.99
						6.0	6.6	15.0	820	1015	1.3	0.99
						6.5	6.7	15.0	810	1002	1.3	0.99
MB-7	32	3.0	25.27	1.09	06/13/02							
						3.5	6.9	16.0	800	966	1.4	0.99
						4.0	6.9	16.0	800	966	1.3	0.99
						4.5	6.9	16.0	800	966	1.5	0.99
MB-8	36	3.0	20.21	2.56	06/13/02							
MB-8	36	3.0	20.21	2.56	06/13/02	7.5	7.0	15.0	1220	1510	2.0	0.99
MB-8	36	3.0	20.21	2.56	06/13/02	7.5 8.0	7.0 7.1	15.0 15.0	1220 1250	1510 1547	2.0 1.8	0. 99 0. 99

TABLE 3: FIELD WATER QUALITY MEASUREMENTS CONDUCTED DURING WELL PURGING, JUNE 2002

Well I.D.	Total Depth (ft)	Approx Stickup (ft)	Depth to Water (ftbtoc)	Casing Volume (gai)	Date	Volume Pumped (gal)	рН	Temp (C)	Specific Conductance (umhos/cm) (1)	Specific Conductance (um hos/cm) (2)	Dissolved Oxygen (mg/L)	Conversion Factor (K)
MB-9	29	2.80	17.68	1.83	06/13/02							
						5.5	7.5	13.0	380	495	2.1	0.99
						6.0	7.6	12.5	340	449	2.3	0.99
						6.5	7.6	13.5	380	489	2.0	0.99
MB-10	30	3.10	26.00	0.65	06/13/02							
						2.0	7.1	15.0	850	804	6.7	0.99
						2.5	7.1	15.0	630	780	6.7	0.99
						3.0	7.2	15.0	600	743	6.8	0.99

NA - Not Applicable

fibtoc - feet below top of case

stickup - measured distance between the ground surface and the top of casing

(1) - Field measured conductivity.

(2) - Specific conductance value corrected to 25 C and adjusted using conversion factor (K).

Table 4

Data Qualifier Definitions

Qualifier	Description
U	The analyte was analyzed for, but was not detected above the reported sample quantitation limit.
J	The analyte was positively identified; the numerical value is the approximate concentration of the analyte in the sample.
N	The analysis indicates the presence of an analyte for which there is presumptive evidence to make a "tentative identification".
NJ	The analysis indicates the presence of an analyte that has been "tentatively identified" and the associated value represents its approximate concentration
UJ	The analyte was not detected about the reported sample quantitation limit. However, the reported quantitation limit is approximate and may or may not represent the actual limit of quantitation necessary to accurately and precisely measure the analyte in the sample.
R	The sample results are rejected due to serious deficiencies in the ability to analyze the sample and meet quality control criteria. The presence or absence of the analyte cannot be verified.

Table 5 Marion (Bragg) Landfill Sample Designation Key Second Quarter 2002 Sampling Event June 2002

Sample Designation	Sample Location	Parameters	Date Collected
Ground Water			
GW01PB	MB-10	TSS, CI⁻, COD, NH₃-N	6/13/02
GW02PB	MB-9	TSS, CI ⁻ , COD, NH ₃ -N,	6/13/02
GW03PB	MB-5	TSS, CI ⁻ , COD, NH₃-N	6/13/02
GW04PB	MB-6	TSS, CI [*] , COD, NH₃-N	6/13/02
GW05PB	MB-7	TSS, Cl ⁻ , COD, NH₃-N	6/13/02
GW06PB	MB-8	TSS, CI ⁻ , COD, NH₃-N	6/13/02
GW07PB	MB-2	TSS, CI ⁻ , COD, NH₃-N	6/13/02
GW08PB	MB-1	TSS, Cl⁻, COD, NH₃-N	6/13/02
GW08DPPB	MB-1	TSS, CI ⁻ , COD, NH₃-N	6/13/02
GW08MSPB	MB-1	TSS, Cl ⁻ , COD, NH₃-N	6/13/02
GW08MSDPB	MB-1	TSS, Cl ⁻ , COD, NH₃-N	6/13/02
GW09FBPB	Field Blank	TSS, CI ⁻ , COD, NH ₃ -N	6/13/02

Table 6: GROUNDWATER CHEMISTRY DATA, JUNE 2002

MONITORING WELL	MB-1	MB-2	MB-5	MB-6	MB-7	MB-8	MB-9	MB-10	DUPLICATE *	
LOCATION IN AQUIFER	BOTTOM	TOP	TOP	BOTTOM	TOP	BOTTOM	TOP	TOP	(MB-1)	_
INDICATOR PARAMETERS (mg/l	L)									
Ammonia-nitrogen	0.10 U	6.9	0.55	4.7	6.1	7.0	0.46	0.10 U	0.10 U	
C.O.D.	10 W	28 J	30 ქ	41 J	26 J	111	28 J	19 J	10 J	
Chloride	23.8 UJ	11.4 W	21.5 W	14.8 UJ	26.7 W	30.6 U.	12.7 W	22.7 U.	J 23.9 W	
TSS	9.6 J	96.4 J	30 J	288 J	260 J	951 J	110 J	107 J	13.0 J	

Notes: * - Duplicate sample collected from monitoring well MB-1

TABLE 7: WATER QUALITY CRITERIA - UPDATED 2000

	Aoute		Chronic						
	ottsupA		Aquatic		Human				
Parameter	Criteria		Criteria		Health		MCL		
TCL Volatiles (ug/L)									
Acetone	10000	+	222	+					
Benzene	5300	E	118	+	400	1	5	Ε	
Chlorobenzene	1950	+	50	E	2026	+			
1,2-Dichloroethene (total) (1)							70 and 10	ЖE	
Methylene Chloride	193000	E	4289	+	157	Ε			
Toluene	17500	E	389	+	424000	1	1000	Ε	
Trichloroethane	••	_	9400	E			5	Ε	
Trichlomethene	4500	E	21900	Ē	807	1	5	E	
Vinyl Chloride		_		_	5246	í	2	Ē	
TCL Semivolatiles (ug/L)									
Phenoi	10200	E	2560	E	3500	E			
Phthalate Esters	940	E	2360 3	E	50000		••		
Line 1964 - 1964 - 1	8 40	c	3	=	50000	'	•-		
TAL Metals and Cyanide (ug/L)									
Aluminum									
Antimony			••		45000	1	6	Ε	
Arsenic	360	1	190	t	0.175	F	50	Ε	
Barium							2000	Ε	
Beryllium					1.17	1	4	Ε	
Cadmium*	6.7	i	1.6	1	60	+	5	Ε	
Calcium									
Chromium	16	1	11	1	3389	+	100	E	
Cobalt									
Copper* (2)	26	ı	18	1			1300	E	
Cyanide	22	i	5.2	i	24242	+	200	E	
iron	1000	Ė							
Lead* (2)	150	ī	5.8	1	51	+	15	E	
Magnesium								_	
Manganess									
Mercury	2.4	1	0.012	1	0.15	1	2	E	
Nickel*	2100	i	240	i	100	i	100	Ē	
Potassium	2100	•		•		•		-	
Selenium	130	1	25	1			50	Ē	
Silver	9.2	i	0.12	Ė			50	Ē	
Sodium	8.2	•	0.12	-	••			_	
Thallium					48	1	2	Ε	
Vanadium	11000	+	100	+	40	,		_	
Vanadium Zinc*		1	160	Ť					
LIK.	175	1	180	•	•-		*-		
IDEM Parameters (mg/L)									
Ammonia, Total Unionized**	0.027	1	0.0029	ı					
COD									
Chloride	860	1	230	l l					
TSS									

MCL - Misdmum Contaminant Level (Updated per the Safe Drinking Water Act of 1986 and later revisions known as the Phase I, Phase II, and Phase V rules. Phase I became effective January 9, 1989, Phase II became effective in 1992, and Phase V became effective January 17, 1994.)

^{*}Acute and chronic criteria calculated based on worst-case hardness=161 mg/L **Acute and chronic criteria calculated based on worst-case t=5C, pH=7.0

^{- -} Criteria not developed

Source of Data E - U.S. EPA I - IDEM (327 IAC 2)

¹⁻ UEM (327 WC 2)

+ - See section 6.2 of February 1990 report by Beak Consultants Limited Baseline Water Quality Conditions for discussion of sources for the criteria.

(1) The 1,2-Dichloroethene MCL standards are divided into cis-1,2-Dichloroethene at 70 ug/L and trans-1,2 Dichloroethene at 100 ug/L.

(2) - The "MCL" value is an action level for lead and copper (i.e., the lead and copper rule) but it only applies to water supplies as measured at the household tap

TABLE 8: CALCULATED ACUTE AQUATIC CRITERIA AND CHRONIC AQUATIC CRITERIA FOR AMMONIA-NITROGEN, JUNE 2002

Sample	Well		Temp	Total Ammonia in Sample	Calculated Unionized Ammonia (in Sample)	Calculated Ammonia Cri			Criteria Exceeded
Matrix	Number	рΗ	(C)	(mg/L)	(mg/L)*	AAC	CAC	AAC	CAC
Ground Water	MB-1	7.3	15.0	0.10 U	0.0003	0.081	0.0111	No	No
	MB-2	6.8	14.0	6.9	0.0098	0.032	0.003	No	Yes
	MB-5	7.0	15.0	0.55	0.0014	0.051	0.0054	No	No
	MB-6	6.7	15.0	4.7	0.0059	0.029	0.0026	No	Yes
	MB-7	6.9	16.0	6.1	0.0153	0.051	0.0053	No	Yes
	MB-8	7.1	14.5	7.0	0.0237	0.082	0.0072	No	Yes
	MB-9	7.6	13.0	0.46	0.0045	0.103	0.021	No	No
	MB-10	7.2	15.0	0.10 U	0.0002	0.072	0.0088	No	No
	Duplicate+	7.3	15.0	0.10 U	0.0003	0.081	0.0111	No	No

* - Values calculated according to the Indiana Register (1990) (327 IAC 2). Unionized values calculated using 1/2 the detection limit for those samples with results qualified by "U" (i.e., non-detect).

AAC - Acute Aquatic Criteria

CAC - Chronic Aquatic Criteria

^{** -} Celculated according to the USEPA Quality Criteria for Water, 1986 EPA 440/5-86-001(as revised by Water Quality Criteria and Standards Activity Report, August 1982)

⁻ Duplicate sample taken from monitoring well MB-1; used MB-1 readings for duplicate pH and temperature readings.

TABLE 9: COMPARISON OF ADJUSTED RESULTS TO APPLICABLE WATER QUALITY CRITERIA, JUNE 2002

			Monitoring	Sample		Criterion		Average (1)		Concentration	1
		Sample	Well	Concentration	Criterion	Concentration		Concentration	Exceeds	After Mixing	Exceeds
Parameter	Matrix	Location	Zone (1)	(mg/L)	Exceeded	(mg/L)	Source	Of Zone (mg/L)	Criterion	(mg/L) (2)	Criterion
Indicator Parameters				(mg/L)		(mg/L)		(mg/L)		(mg/L)	
Unionized	Groundwater	MB-2	1	0.0098	CAC	0.003	E	0.0105	Yes	0.000006	No
Ammonia (mg/L)	Groundwater	MB-6	II	0.0059	CAC	0.0026	E	0.0057	Yes	0.000003	No
	Groundwater	MB-7	111	0.0153	CAC	0.0053	E	0.0195	Yes	0.000011	No
	Groundwater	MB-8	111	0.0237	CAC	0.0072	E	0.0195	Yes	0.000011	No

CAC - Chronic Aquatic Criteria

E - U.S. EPA

(1) Refer to the Environmental Resources Management (ERM) Remedial Action Plan for Marion (Bragg) Landfill Site, Marion, Indiana, dated 1989, for definition of monitoring well zones and concentration calculations.

(MB-1 and -2 are zone I, MB-3, -4, -5, and -6 are zone II, and MB-7 and -8 are zone III)

(2) Refer to the Camp, Dresser, and McKee (CDM) Remedial Investigation Report,

dated 1987, for mixing zone calculations.

Duplicate sample collected from MB-1

APPENDIX A Chain-of-Custody Forms

COMPUCHEM

CHAIN-OF-CUSTODY RECORD

Point-of-Contact : CO 100 No. 063722 7 Client Address: 303 N Riggin Project Name

T TCLP Sampling complete (Yor N (see Note 1) Project-specific (PS) or Batch (B) QC? W. CWA 600-series Telephone No.: 317 716 34885 C. CLP 3/90 S. SW-846 O Other M. Medium S I 10 Box # U. Unfiltered F. Fittered Sampler Signature BOX #3 1. ZnAc+NaOH + loe H. NaHSO4 + Ice 0 1 5 F. Ice Only G. Other D. H2SO4 + Ice E. Unpreserved C NaOH + Ice B. HNO3 + los Sampler Name: (U. 1/2 /e. BOX #2 A. HCI + Ice Airbill No: 8253 Marion Carrier : Fed 6. Trip Blank 8. Waste 9. Other a division of Liberty Analytical Corp. 7.0 501 Madison Avenue Cary, NC 27513 Soil / Sediment / Sludge 1-800-833-5097 1 Surface Water 2. Ground Water 3. Leachate 4 Rinsate BOX #1

			Box #1	Box #2	Box #3	Box #4 Box #5	Box #6				-	\vdash		\vdash	\vdash	-	F		-		
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Note (1): If "N" lab will hold samples to await remainder of project-maximizing batch size and minimizing QC ratio; if "Y" lab will begin processing batches now. Note (2): Samples stored 60 days after date report mailed at no extra charge.

Note (3): All lab copies of data destroyed after three years.

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Note (1): If "N" lab will hold samples to await remainder of project-maximizing batch size and minimizing QC ratio; if "Y" lab will begin processing batches now. Note (2): Samples stored 60 days after date report mailed at no extra charge. Note (3): All lab copies of data destroyed after three years.

APPENDIX B Trillium, Inc. Data Validation Reports



DATA VALIDATION

FOR

MARION BRAGG LANDFILL MARION, INDIANA

WET CHEMISTRY ANALYSIS DATA Chemical Oxygen Demand (COD) in Water

CET Report Dated June 27, 2002 June 2002 Sample Collections

Chemical Analyses Performed by:

Chemical & Environmental Technology, Inc. Research Triangle Park, North Carolina

FOR

O & M, Inc. Danville, Indiana

BY

Trillium, Inc.
356 Farragut Crossing Drive
Knoxville, TN 37922
(865) 966-8880

August 28, 2002

92241/CAE/DAS \MARION\Jun02\cod



EXECUTIVE SUMMARY

Validation of the wet chemistry analysis data (chemical oxygen demand [COD]) prepared by Chemical & Environmental Technology, Inc. (CET), under subcontract to CompuChem Environmental, for nine water samples and one field blank from the Marion Bragg Landfill Site in Marion, Indiana, has been completed by Trillium, Inc. The data were reported by the laboratory in a single data package that had no identification number but was dated June 27, 2002. This data package was received for review on July 8, 2002, with additional documentation provided on July 22, 2002. The following field samples were reported:

GW08PB (MB-1)	GW08DPPB (MB-1D)	GW07PB (MB-2)
GW03PB (MB-5)	GW04PB (MB-6)	GW05PB (MB-7)
GW06PB (MB-8)	GW02PB (MB-9)	GW01PB (MB-10)
GW09FRPR (Field Blank)		

Based on the validation effort, results for COD in all samples except GW06PB were qualified as estimated (J, UJ).

Brief explanations of the reasons for the actions taken above may be found in the Overall Assessment (Section IX). Note that if full documentation of the initial calibrations associated with these analyses is ever produced by the laboratory, it may be possible to remove most of these qualifiers. Details of the validation findings and conclusions based on review of the results for each quality control requirement are provided in the remaining sections of this report.

Documentation issues are discussed in Section VIII.

This validation report should be considered <u>part of the data package</u> for all future distributions of the COD data.



INTRODUCTION

Analyses were performed according to EPA's "Chemical Analysis of Water and Wastes" (EPA-600/4-79-020), March 1983, Method 410.4. Since no guidelines specific to the analytical method used are available, the validation was based on the requirements of the referenced procedure, the specifications of the project-specific Quality Assurance Project Plan (QAPP), and best professional judgment. The validation approach was similar to that described in EPA's "National Functional Guidelines for Inorganic Data Review" (EPA-540/R-94/013, February 1994). Results of sample analyses were reported by the laboratory without qualifications.

The data validation process is intended to evaluate data on a technical basis rather than a contract or method compliance basis. An initial assumption is that the data package contains sufficient raw data documentation to facilitate the validation process, comparable to the level of documentation required in a Contract Laboratory Program (CLP) data package.

During the validation process, laboratory data are verified against all available supporting documentation. Based on this review, qualifier codes may be added by the data validator. Validated results are, therefore, either qualified or unqualified. Unqualified results mean that the reported values may be used without reservation. Final validated results are annotated with the following codes in accordance with EPA's National Functional Guidelines:

- U The material was analyzed for, but was not detected above the level of the associated value. The associated value is either the sample quantitation limit or the sample detection limit.
- R The data are unusable. (Note: The analyte may or may not be present.)
- J The associated value is an estimated quantity.
- UJ The material was analyzed for, but was not detected. The associated value is an estimate and may be inaccurate or imprecise.

These codes are recorded on the client-customized data tables (Attachment A) and the laboratory's Final Reports of Analysis (Attachment B) to qualify the results as appropriate according to the review of the data package.

Two facts should be noted by all data users. First, the "R" qualifier means that the laboratory-reported value is unusable. In other words, due to significant quality control problems, the analysis is invalid and provides no information as to whether the analyte is present or not. Rejected values should not appear on data tables because they cannot be relied upon, even as a last resort. Second, no analyte concentration is guaranteed to be accurate even if all associated



quality control is acceptable. Strict quality control conformance serves only to increase confidence in reported results; any analytical result will always contain some error.

The data user is also cautioned that the validation effort is based on the raw data printouts as provided by the laboratory. Software manipulation cannot be routinely detected during validation; unless otherwise stated in the report, these kinds of issues are outside the scope of this review.



I. Holding Times, Preservation and Sample Integrity

The water samples were collected on June 13, 2002. All COD analyses were conducted well within the 28-day holding time specified by both the referenced method and the QAPP.

An acceptable (4°C±2°C) cooler temperature on receipt of the samples at CET (2.5°C) was recorded on the chain of custody (COC) record documenting the shipment of samples from CompuChem to CET. No preservation information was recorded on this COC by CompuChem, and no documentation of sample pH on receipt at CET was found in the data package. However, the use of sulfuric acid and ice was documented on the field COCs (documenting shipment of the samples from the site to CompuChem) and verification of successful acidification of the COD sample containers was documented on CompuChem's receiving log, both of which were provided in CompuChem's data package for the other analysis parameters requested on these samples. Therefore, no action was taken on this basis.

II. Calibrations

The reported COD analyses were performed on 6/17/02. An initial calibration (IC) performed on 6/4/02 was referenced on the analysis bench sheet. No indication of the calibration range or the correlation coefficient for the calibration curve was documented, and the raw data for the IC were not provided, despite being specifically requested from the laboratory (see Section VIII and Attachment C). Repeated attempts to obtain this documentation in support of the March 2002 sample analyses were unsuccessful, and no further attempt was made by the validator to obtain it in support of these data.

A check standard at 75 mg/L was run at the start of the COD analysis series, and a check standard at 150 mg/L was run at the end of the analysis series. Acceptable recoveries (QC 85-115%) were reported for the 75 mg/L standard (95%) and the 150 mg/L standard (102%). In the absence of raw data for the associated IC, neither of the check standard results could be verified by the validator.

In the absence of the raw IC data, the validator cannot verify that the linear regression used to calculate sample results was acceptable (i.e., that it had an acceptable correlation coefficient). The available information also does not specify the actual calibration range (in particular, the low standard concentration is not known) and does not indicate how many standards were used to establish the calibration. See Section VII for further discussion.

III. Blanks

A blank was run at the start and end of the COD analysis series. No absorbance response at 600 nanometers was documented for either of these blanks.



One field blank, GW09FBPB, was submitted with this sample set. COD was not detected above the laboratory-specified reporting limit (RL) of 10 mg/L in the field blank.

IV. Laboratory Control Samples (LCS)

No LCS was run in association with these samples.

V. Laboratory and Field Duplicate Analyses

A. <u>Laboratory Duplicates</u>

None of the samples in this data set were run in duplicate by the laboratory.

Duplicate analysis of an unrelated sample was recorded on the analysis run log. These data are not relevant to the Marion Bragg site samples, and were not considered in the validation effort.

B. Field Duplicates

Sample GW08DPPB was identified as a field duplicate of GW08PB. COD was detected at a concentration equivalent to the laboratory-specified RL (10 mg/L) in GW08PB, but was not detected (10 U mg/L) in GW08DPPB. This discrepancy probably reflects the increased variability inherent near the RL. Based on professional judgment, results for COD in GW08PB and GW08DPPB were qualified as estimated (J, UJ) due to this lack of confirmation.

VI. Matrix Spike Analysis

No spiked sample analyses were reported in association with this data set.

VII. Sample Results Verification

All sample results for COD were accurately transcribed from the bench sheet by the laboratory. However, in the absence of raw data for the associated IC, the reported sample concentrations could not be verified by the validator. Since the lowest concentration at which accurate recovery was demonstrated in association with these analyses was 75 mg/L (see Section II), all sample results less than 75 mg/L were qualified as estimated (J, UJ). Note that if full documentation of the initial calibrations associated with these analyses is ever produced by the laboratory, it may be possible to remove these qualifiers.



An RL of 10 mg/L was specified by the laboratory for all non-detected results. Since the calibration ranges established by the ICs were not documented in the data package, the validity of this RL could not be verified by the validator.

All sample results were greater than or equal to 10 mg/L. With the exception of the result for GW06PB, which was greater than 100 mg/L and was reported to three significant figures, all of the sample results were reported to two significant figures by the laboratory; this is consistent with the results found on the bench sheet. Although the historical data generated in support of this project reflect three significant figures for results that are greater than 10 mg/L, the sample results calculations cannot be performed by the validator without the IC raw data and it would not be correct to simply add a decimal place of ".0" to each of the reported values. Therefore, no corrections were made to the reported results with respect to significant figures despite the inconsistency with historical data.

The data tables in Attachment A list all individual sample analyte results, whether or not the value or qualifier was affected by the findings of the validation effort.

VIII. Documentation

Field-initiated COC records were not included in the COD data package, but were available in the CompuChem data package for the other analysis parameters run on these samples. A single COC record documenting transfer of the samples from CompuChem to CET was present; all samples reported in this data set were listed on this form. The following issues were noted:

- Preservation of the samples with sulfuric acid and ice was not recorded on the interlaboratory COC by CompuChem at the time of shipment, and sample pHs were not recorded on the COC by CET on receipt of the samples.
- No courier information was documented, nor was a copy of the courier airbill (if applicable) included in the data package.
- The date accompanying the first "Relinquished by" signature was incomplete; no year was recorded.
- Improper corrections were observed. To preserve the integrity of these documents, all necessary corrections must be made by drawing a single line through the incorrect entry, inserting the correct information, and initialing and dating the change. Obliterations, unsigned cross-outs, and "write-overs" are not legally defensible.

No IC raw data were provided in the data package, despite a specific request for this information by the validator (see Attachment C). It may be that the IC data are not routinely printed in hard copy form by the laboratory when they are generated. However, since the reported sample



results cannot be verified in the absence of these data, full documentation must be produced, in manual or print-out form, when validation is required.

The COD data package (dated June 27, 2002) was originally received by Trillium on 7/8/02. However, this package contained only results forms and the COC record; no supporting raw data were provided. A written request for the missing documentation, including raw data documentation of the referenced initial calibration(s), was sent to CompuChem on 7/9/02 (see Attachment C). A replacement data package, still dated June 27, 2002, was received by Trillium on 7/22/02. The replacement package included bench sheets for the 6/17/02 sample analysis series, but not for the referenced IC, which was run on 6/4/02. No further action was taken by the validator, and the replacement package, although still incomplete, was the subject of this validation effort.

As discussed throughout this report, these documentation issues directly affect the technical validity of the analytical data generated. They would very likely be problematic if the data were to be used in litigation.

IX. Overall Assessment

Based on the validation effort, reported sample results were qualified as follows:

- Results for COD in all samples except GW06PB were qualified as estimated (J, UJ) because these results are all less than 75 mg/L, which is the lowest concentration at which accurate recovery was demonstrated in association with these analyses. Note that if full documentation of the initial calibrations associated with these analyses is ever produced by the laboratory, it may be possible to remove these qualifiers.
- Based on professional judgment, results for COD in GW08PB and GW08DPPB were
 qualified as estimated (J, UJ) due to lack of confirmation at a low concentration in
 the laboratory duplicate analyses.

Documentation issues are discussed in Section VIII.

This validation report should be considered <u>part of the data package</u> for all future distributions of the COD data.



ATTACHMENT A

DATA TABLES
COD in Water
June 2002 Sample Collections - Marion Bragg Landfill
CET Report dated June 27, 2002

Marion Bragg Landfill - March 2002 - Chemical Oxygen Demand in Ground Water and Surface Water

Results are in mg/L

Collection Point ===> Sample ID =====>	MB-1	MB-1D	MB-2	MB-5	MB-6	MB-7	MB-8	MB-9
	GW08PB	GW08DPPB	GW07PB	GW03PB	GW04PB	GW05PB	GW06PB	GW02PB
Lab Sample No. ===> Collection Date. ===>	197897	197898	197 8 96	197892	197893	197894	19 78 95	197891
	6/13/02	6/13/02	6/13/02	6/13/02	6/13/02	6/13/02	6/13/02	6/13/02
RL	= 							
COD 10	10 UJ	10 J	28 J	30 J	41 J	26 J	111	28 J

Marion Bragg Landfill - March 2002 - Chemical Oxygen Demand in Ground Water and Surface Water

Results are in	mg/L		
Collection Point = Sample ID ===================================	===>	MB-10 GW01PB 197890 6/13/02	Field Blank GW09FBPB 197899 6/13/02
	RL		
COD	10	19 J	10 U J



ATTACHMENT B

FINAL REPORTS OF ANALYSES

COD in Water

June 2002 Sample Collections - Marion Bragg Landfill

CET Report dated June 27, 2002

ENVIRONMENTAL ANALYTICAL SERVICES

FINAL REPORT OF ANALYSES

COMPUCHEM

Attn: DIANE BYRD 501 MADISON AVENUE CARY, NC 27513-

REPORT DATE: 06/27/02

SAMPLE NUMBER- 197897 SAMPLE ID- GW08PB

C088/26/02

SAMPLE MATRIX- GW TIME SAMPLED- 1130

DATE SAMPLED- 06/13/02 DATE RECEIVED- 06/14/02 SAMPLER- NOT SPECIFIED TIME RECEIVED- 1430

DELIVERED BY- CHRIS BRAND

RECEIVED BY- ALT

Page 1 of 1

PROJECT NAME : MARION BRAGG

ANALYSIS

ANALYSIS

METHOD

DATE

RESULT UNITS

CHEMICAL OXYGEN DEMAND

EPA 410.4 06/17/02 JMB

10 UJ ~10 mg/L COE 8/28/08

10

PQL = Practical Quantitation Limit

Results followed by the letter J are estimated concentrations.

NC DENR CERTIFICATIONS: DWQ - 96; PUBLIC WATER SUPPLY - 37724

ENVIRONMENTAL ANALYTICAL SERVICES

FINAL REPORT OF ANALYSES

COMPUCHEM

Attn: DIANE BYRD 501 MADISON AVENUE CARY, NC 27513-

REPORT DATE: 06/27/02

Caeshilor

SAMPLE NUMBER- 197898 SAMPLE ID- GW08DPPB

MB-ID

SAMPLE MATRIX- GW

DATE SAMPLED- 06/13/02

DATE RECEIVED- 06/14/02 SAMPLER- NOT SPECIFIED

TIME SAMPLED- 1130

TIME RECEIVED- 1430

DELIVERED BY- CHRIS BRAND

RECEIVED BY- ALT

(28/08/0x

Page 1 of 1

PROJECT NAME : MARION BRAGG

ANALYSIS

ANALYSIS

METHOD

DATE

RESULT UNITS BY

CHEMICAL OXYGEN DEMAND

EPA 410.4 06/17/02 JMB

10 mg/L J

10

PQL = Practical Quantitation Limit

Results followed by the letter J are estimated concentrations.

NC DENR CERTIFICATIONS: DWQ - 96; PUBLIC WATER SUPPLY - 37724

ENVIRONMENTAL ANALYTICAL SERVICES

FINAL REPORT OF ANALYSES

COMPUCHEM

Attn: DIANE BYRD 501 MADISON AVENUE CARY, NC 27513-

REPORT DATE: 06/27/02

Ca88/20/08

SAMPLE NUMBER- 197896 SAMPLE ID- GW07PB

DATE SAMPLED- 06/13/02

SAMPLE MATRIX- GW

DATE RECEIVED- 06/14/02 SAMPLER- NOT SPECIFIED

TIME SAMPLED- 1045

TIME RECEIVED- 1430 DELIVERED BY- CHRIS BRAND

RECEIVED BY- ALT

Ca88/28/08

Page 1 of 1

PROJECT NAME : MARION BRAGG

ANALYSIS

ANALYSIS

METHOD

DATE

RESULT UNITS ΒY

POL

CHEMICAL OXYGEN DEMAND

EPA 410.4 06/17/02 JMB

28 mg/L J

10

PQL = Practical Quantitation Limit

Results followed by the letter J are estimated concentrations.

NC DENR CERTIFICATIONS: DWQ - 96; PUBLIC WATER SUPPLY - 37724

ENVIRONMENTAL ANALYTICAL SERVICES

FINAL REPORT OF ANALYSES

COMPUCHEM Attn: DIANE BYRD 501 MADISON AVENUE CARY, NC 27513-

REPORT DATE: 06/27/02

SAMPLE NUMBER- 197892 SAMPLE ID- GW03PB DATE SAMPLED- 06/13/02

MB-5 Ca8 8 20/08 SAMPLE MATRIX- GW

DATE RECEIVED- 06/14/02 SAMPLER- NOT SPECIFIED

TIME SAMPLED- 0935 RECEIVED BY- ALT

Ca88/28/08

TIME RECEIVED- 1430 DELIVERED BY- CHRIS BRAND

Page 1 of 1

PROJECT NAME : MARION BRAGG

ANALYSIS

ANALYSIS

METHOD

DATE

RESULT UNITS BY

CHEMICAL OXYGEN DEMAND

EPA 410.4 06/17/02 JMB

30 mg/L J

10

PQL = Practical Quantitation Limit

Results followed by the letter J are estimated concentrations.

NC DENR CERTIFICATIONS: DWQ - 96; PUBLIC WATER SUPPLY - 37724

ENVIRONMENTAL ANALYTICAL SERVICES

FINAL REPORT OF ANALYSES

COMPUCHEM Attn: DIANE BYRD

501 MADISON AVENUE CARY, NC 27513REPORT DATE: 06/27/02

SAMPLE NUMBER- 197893 SAMPLE ID- GW04PB

caesmor

SAMPLE MATRIX- GW

DATE SAMPLED- 06/13/02

DATE RECEIVED- 06/14/02 SAMPLER- NOT SPECIFIED

TIME SAMPLED- 1000

TIME RECEIVED- 1430

DELIVERED BY- CHRIS BRAND

RECEIVED BY- ALT

Page 1 of 1

PROJECT NAME : MARION BRAGG

ANALYSIS

ANALYSIS

METHOD

DATE

RESULT UNITS

CHEMICAL OXYGEN DEMAND

EPA 410.4 06/17/02 JMB

41 mg/L J

PQL = Practical Quantitation Limit

Results followed by the letter J are estimated concentrations.

NC DENR CERTIFICATIONS: DWQ - 96; PUBLIC WATER SUPPLY - 37724

ENVIRONMENTAL ANALYTICAL SERVICES

FINAL REPORT OF ANALYSES

COMPUCHEM

Attn: DIANE BYRD 501 MADISON AVENUE CARY, NC 27513-

REPORT DATE: 06/27/02

SAMPLE NUMBER- 197894 SAMPLE ID- GW05PB

MB-7 Caespolor

SAMPLE MATRIX- GW

DATE SAMPLED- 06/13/02

DATE RECEIVED- 06/14/02 SAMPLER- NOT SPECIFIED

TIME SAMPLED- 1020

TIME RECEIVED- 1430 DELIVERED BY- CHRIS BRAND

RECEIVED BY- ALT

Page 1 of 1

PROJECT NAME : MARION BRAGG

ANALYSIS

ANALYSIS

METHOD

DATE

RESULT UNITS BY

PQL

CHEMICAL OXYGEN DEMAND

EPA 410.4 06/17/02 JMB

26 mg/L J

PQL = Practical Quantitation Limit

Results followed by the letter J are estimated concentrations.

NC DENR CERTIFICATIONS: DWQ - 96; PUBLIC WATER SUPPLY - 37724

ENVIRONMENTAL ANALYTICAL SERVICES

FINAL REPORT OF ANALYSES

COMPUCHEM

Attn: DIANE BYRD 501 MADISON AVENUE CARY, NC 27513-

REPORT DATE: 06/27/02

SAMPLE NUMBER- 197895 SAMPLE ID- GW06PB

MB-8 CRE 8/20/02

SAMPLE MATRIX- GW

DATE SAMPLED- 06/13/02

DATE RECEIVED- 06/14/02 SAMPLER- NOT SPECIFIED

TIME SAMPLED- 0905 RECEIVED BY- ALT

TIME RECEIVED- 1430

DELIVERED BY- CHRIS BRAND

Page 1 of 1

PROJECT NAME : MARION BRAGG

ANALYSIS

ANALYSIS

METHOD

DATE

RESULT UNITS

PQL

CHEMICAL OXYGEN DEMAND

EPA 410.4 06/17/02 JMB

111 mg/L

10

PQL = Practical Quantitation Limit

Results followed by the letter J are estimated concentrations.

NC DENR CERTIFICATIONS: DWQ - 96; PUBLIC WATER SUPPLY - 37724

ENVIRONMENTAL ANALYTICAL SERVICES

FINAL REPORT OF ANALYSES

COMPUCHEM Attn: DIANE BYRD 501 MADISON AVENUE CARY, NC 27513-

REPORT DATE: 06/27/02

SAMPLE NUMBER- 197891 SAMPLE ID- GW02PB

MB-9

SAMPLE MATRIX- GW

DATE SAMPLED- 06/13/02

Catelrolor TIME SAMPLED- 0835

TIME RECEIVED- 1430

DATE RECEIVED- 06/14/02 SAMPLER- NOT SPECIFIED DELIVERED BY- CHRIS BRAND RECEIVED BY- ALT

COE8128102

Page 1 of 1

PROJECT NAME : MARION BRAGG

ANALYSIS

ANALYSIS

METHOD

DATE

RESULT UNITS BY

POL

CHEMICAL OXYGEN DEMAND

EPA 410.4 06/17/02 JMB

28 mg/L J

10

PQL = Practical Quantitation Limit

Results followed by the letter J are estimated concentrations.

NC DENR CERTIFICATIONS: DWQ - 96; PUBLIC WATER SUPPLY - 37724

ENVIRONMENTAL ANALYTICAL SERVICES

FINAL REPORT OF ANALYSES

COMPUCHEM Attn: DIANE BYRD 501 MADISON AVENUE CARY, NC 27513-

REPORT DATE: 06/27/02

SAMPLE NUMBER- 197890 SAMPLE ID- GW01PB

MB-10

SAMPLE MATRIX- GW

DATE SAMPLED- 06/13/02

DATE RECEIVED- 06/14/02 SAMPLER- NOT SPECIFIED

CAE 8 70/07 TIME SAMPLED- 0805

TIME RECEIVED- 1430

DELIVERED BY- CHRIS BRAND

RECEIVED BY- ALT

Page 1 of 1

PROJECT NAME : MARION BRAGG

ANALYSIS

ANALYSIS

METHOD

DATE

RESULT UNITS BY

POL

CHEMICAL OXYGEN DEMAND

EPA 410.4 06/17/02 JMB

19 mg/L J

PQL = Practical Quantitation Limit

Results followed by the letter J are estimated concentrations.

COE 8/28/02

NC DENR CERTIFICATIONS: DWQ - 96; PUBLIC WATER SUPPLY - 37724

ENVIRONMENTAL ANALYTICAL SERVICES

FINAL REPORT OF ANALYSES

COMPUCHEM

Attn: DIANE BYRD 501 MADISON AVENUE CARY, NC 27513-

REPORT DATE: 06/27/02

SAMPLE NUMBER- 197899 SAMPLE ID- GW09FBPB

Field Blank

BY

SAMPLE MATRIX- GW

DATE SAMPLED- 06/13/02

DATE RECEIVED- 06/14/02 SAMPLER- NOT SPECIFIED

TIME SAMPLED- 1035 CAE 8 26/02 RECEIVED BY- ALT

TIME RECEIVED- 1430

DELIVERED BY- CHRIS BRAND

Page 1 of 1

PROJECT NAME : MARION BRAGG

ANALYSIS

ANALYSIS

METHOD

DATE

RESULT UNITS

POL

CHEMICAL OXYGEN DEMAND

EPA 410.4 06/17/02 JMB

10 UJ =10 mg/L

CaE8/28/08

10

PQL = Practical Quantitation Limit

Results followed by the letter J are estimated concentrations.

NC DENR CERTIFICATIONS: DWQ - 96; PUBLIC WATER SUPPLY - 37724



ATTACHMENT C

TRILLIUM COMMUNICATION REQUESTING RAW DATA DOCUMENTATION
COD in Water
June 2002 Sample Collections - Marion Bragg Landfill
CET Report dated June 27, 2002

Carol Erikson

From:

"Carol Erikson" < cerikson@trilliuminc.com>

To:

"Rodney Raimonde" < rraimonde@compuchemlabs.com>

Sent:

Tuesday, July 09, 2002 6:39 AM

Subject:

Marion Bragg COD Data

Rodney -

Yesterday, I received a CET data package for COD analyses dated 6/27/02 and applicable to the latest set of samples from Marion Bragg.

The package contains only results forms and a chain of custody record - no supporting raw data are provided, although "Full Data Package" was requested on the chain of custody. Please request the missing information from CET (<u>including</u> raw data documentation of their referenced ICals) and forward to me ASAP.

Thanks!

Carol

Carol Erikson
Trillium, Inc.
cerikson@trilliuminc.com
865/966-8880
865/966-8885 fax



DATA VALIDATION

FOR

MARION BRAGG LANDFILL MARION, INDIANA

INORGANIC ANALYSIS DATA
Total Suspended Solids,
Chloride, and Ammonia-Nitrogen in Water

Sample Delivery Group #RS1067 June 2002 Sample Collections

Chemical Analyses Performed by:

CompuChem Environmental Cary, North Carolina

FOR

O & M, Inc. Danville, Indiana

BY

Trillium, Inc.
356 Farragut Crossing Drive
Knoxville, TN 37922
(865) 966-8880

August 29, 2002



EXECUTIVE SUMMARY

Validation of the wet chemistry analysis data (total suspended solids [TSS], ammonia-nitrogen [ammonia], and chloride) prepared by CompuChem Environmental for nine water samples and one field blank (FB) from the Marion Bragg Landfill Site in Marion, Indiana, has been completed by Trillium, Inc. The data were issued by the laboratory in a single data package under Sample Delivery Group (SDG) #RS1067, which was received for review on August 1, 2002, with additional information provided on August 27 and 28, 2002. The following field samples were reported:

GW08PB (MB-1)	GW08DPPB (MB-1D)	GW07PB (MB-2)
GW03PB (MB-5)	GW04PB (MB-6)	GW05PB (MB-7)
GW06PB (MB-8)	GW02PB (MB-9)	GW01PB (MB-10)
GW09FBPB (Field Blank)		

Based on the validation effort, the sample results were qualified or corrected as follows:

- Results for chloride in GW08PB, GW08DPPB, GW07PB, GW03PB, GW04PB, GW05PB, GW06PB, GW02PB, and GW01PB were qualified as less than the reported values and as estimated (UJ).
- The result for chloride in GW09FBPB was qualified as estimated (J).
- Results for TSS in GW08PB, GW08DPPB, GW07PB, GW03PB, GW04PB, GW05PB, GW06PB, GW02PB, and GW01PB were qualified as estimated (J).
- The positive results for ammonia in GW07PB, GW03PB, GW04PB, GW05PB, GW06PB, and GW02PB and for TSS in GW08PB were rounded to reflect two significant figures (instead of three as reported by the laboratory).
- The RLs for ammonia, chloride, and TSS were rounded to reflect two significant figures (instead of three as reported by the laboratory).

Brief explanations of the reasons for the actions taken above may be found in the Overall Assessment (Section X). Details of the validation findings and conclusions based on review of the results for each quality control requirement are provided in the remaining sections of this report.

Documentation issues are discussed in Section IX.

This validation report should be considered <u>part of the data package</u> for all future distributions of the wet chemistry data.



INTRODUCTION

Analyses for the requested parameters were performed by the laboratory according to the following analytical methods:

Ammonia - EPA 350.1 Chloride - EPA 300.1 Total Suspended Solids (TSS) - EPA 160.2

These methods are found in "Methods for Chemical Analysis of Water and Wastes," EPA 600/4-79/020, Rev. 3/83, and "Methods for the Determination of Organic and Inorganic Compounds in Drinking Water, Volume 1" (EPA 815/R-00/014).

Since no validation guidelines specific to the analytical methods used are available, the validation was based on the requirements of the referenced methods, the specifications of the project-specific Quality Assurance Project Plan (QAPP) and best professional judgment. The validation approach was similar to that described in USEPA's "National Functional Guidelines for Inorganic Data Review" (EPA-540/R-94/013, February 1994).

The data validation process is intended to evaluate data on a technical basis rather than a contract or method compliance basis. An initial assumption is that the data package contains sufficient raw data documentation to facilitate the validation process, comparable to the level of documentation required in a Contract Laboratory Program (CLP) data package.

During the validation process, laboratory data are verified against all available supporting documentation. Based on the findings of this review, qualifier codes may be added by the data validator. Validated results are, therefore, either qualified or unqualified. Unqualified results mean that the reported values may be used without reservation. Final validated results are annotated with the following codes in accordance with EPA's validation guidelines:

- U The material was analyzed for, but was not detected above the level of the associated value. The associated value is either the sample quantitation limit or the sample detection limit.
- R The data are unusable. (Note: Analyte may or may not be present.)
- J The associated value is an estimated quantity.
- UJ The material was analyzed for, but was not detected. The associated value is an estimate and may be inaccurate or imprecise.



These codes are recorded on the customized data tables (Attachment A) and the laboratory's Classical Chemistry Analyses Data Sheets (Form Is; Attachment B) to qualify the results as appropriate according to the review of the data packages.

Two facts should be noted by all data users. First, the "R" qualifier means that the laboratory-reported value is unusable. In other words, due to significant quality control problems, the analysis is invalid and provides no information as to whether the analyte is present or not. Rejected values should not appear on data tables because they cannot be relied upon, even as a last resort. Second, no analyte concentration is guaranteed to be accurate even if all associated quality control is acceptable. Strict quality control conformance serves only to increase confidence in reported results; any analytical result will always contain some error.

The data user is also cautioned that the validation effort is based on the raw data printouts as provided by the laboratory. Software manipulation cannot be routinely detected during validation; unless otherwise stated in the report, these kinds of issues are outside the scope of this review.



I. Holding Times, Preservation and Sample Integrity

The samples were collected on June 13, 2002. Analyses for all parameters were conducted within the holding times specified by the referenced methods and the QAPP (28 days from collection for chloride and ammonia; seven days from collection for TSS).

Preservation of the samples for ammonia (and chemical oxygen demand, COD) analysis with sulfuric acid and ice and the samples for TSS and chloride analyses with ice was documented by the sampler on both chain of custody (COC) records. Acceptable cooler temperatures (4°C) on receipt at the laboratory were documented on both COCs and on the laboratory's receiving log. Acceptable pHs (<2) for the ammonia containers were documented on the receiving log for all samples, but no receiving log pertaining to the sample containers for COD analysis was provided in the data package. (Note: A single container is routinely provided to the laboratory for both ammonia and COD analyses. The laboratory splits these samples to facilitate their subcontract of the COD analyses to Chemical and Environmental Technology, Inc. (CET); therefore, the two analyses are separately logged-in at CompuChem). Upon request, the laboratory provided the COD receiving log, which documented acceptable pHs for these samples on receipt at the laboratory, to Trillium via facsimile on 8/27/02. No further action was taken by the validator.

II. Calibrations

All samples were analyzed for chloride on 6/18/02. A calibration curve incorporating a blank and eight standards at concentrations ranging from 0.1 mg/L to 50 mg/L was documented for 6/5/02. The reported correlation coefficient for the best-fit linear regression describing the calibration data was acceptable (>0.995) and was verified by the validator. ICV/CCV standards were run at appropriate frequencies during the chloride analysis series and showed acceptable recoveries relative to the true values (102-107%; QC 85-115%).

The samples were analyzed for ammonia on 6/17/02; a calibration curve incorporating a blank and seven standards at concentrations ranging from 0.1 mg/L to 8 mg/L was documented for this date. The reported correlation coefficient for the best-fit linear regression describing the calibration data was acceptable (>0.995) and was verified by the validator. ICV/CCV standards were run at appropriate frequencies during the ammonia analysis series and showed acceptable recoveries relative to reported true values (96.5-105%; QC 85-115%). However, since only final results are displayed in the raw data documentation (i.e., absorbance values are not provided), these results cannot be verified by the validator.

Calibration is not applicable to the weight measurements used to determine TSS.



III. Blanks

No contamination was reported in any of the method blanks associated with the sample analyses; these results are supported by the raw data available in the data package.

A field blank (GW09FBPB) was submitted for analysis with this set of site samples. No TSS or ammonia was detected above the applicable reporting limit (RL) in the field blank. Chloride was reported at 6.9 mg/L in the field blank. Results for chloride in GW08PB, GW08DPPB, GW07PB, GW03PB, GW04PB, GW05PB, GW06PB, GW02PB, and GW01PB were qualified as less than the reported values (U) based on the associated field blank contamination. In each case, the sample result was less than five times the field blank concentration.

It is unusual for chloride to be detected at a concentration this high in a field blank. The reported site sample concentrations are very comparable to the concentrations reported in previous sampling rounds, and the field duplicate results match quite well (see Section VII), suggesting that these results may actually represent true sample components rather than artifacts of the sample collection and handling procedures. At the discretion of the data user, the source water used to prepare the field blank should be evaluated for the presence of chloride, especially if it is a source not previously utilized in support of this project. Further investigation of this issue is beyond the scope of this validation effort.

IV. Laboratory Control Samples (LCS)

Laboratory Control Samples prepared and analyzed with the samples for all three parameters showed acceptable recoveries, ranging from 96.7-107%.

V. Laboratory Duplicate Analysis

Laboratory duplicate analyses were performed for TSS using GW08PB. Reproducibility was very good for these paired samples, with a relative percent difference (RPD) of 13.3 percent (QC \leq 25 RPD).

VI. Matrix Spike/Matrix Spike Duplicate (MS/MSD) Analysis

MS/MSD analyses were performed on sample GW08PB for ammonia and chloride. Recoveries for ammonia (95.5% and 93.3%) were acceptable (QAPP QC 80-120%) and showed excellent reproducibility, with an RPD of 2.4% (QAPP QC ≤20 RPD) based on measured concentrations.



Recoveries for chloride were unacceptably low in both spiked analyses (76.8% and 78.2%), although they showed excellent reproducibility (1.1 RPD). Results for chloride in all samples were qualified as estimated (J) on this basis.

VII. Field Duplicates

Samples GW08PB and GW08DPPB were identified as a field duplicate pair. Positive paired results showed very good reproducibility (QAPP QC ≤25% RPD) for chloride (0.4 RPD). TSS results showed unacceptable reproducibility (30 RPD); results for TSS in all samples except GW09FBPB were qualified as estimated (J) on this basis.

Ammonia was not detected above the RL (0.10 U) in either sample analysis. Therefore, no quantitative evaluation of precision could be made for this parameter using these data.

VIII. Sample Results Verification

With the exception noted below, results reported for TSS were correctly calculated and accurately reported from the raw data for all samples.

The result for TSS in GW07PB was incorrectly reported by the laboratory as 48.2 mg/L, while the supporting raw data indicated a concentration of 96.4 mg/L. At the request of the validator, the laboratory rechecked their calculations and provided a corrected Form I for this sample, showing a concentration of 96.4 mg/L for TSS. No further action was necessary.

According to the analysis run log, all samples (including the field blank) were run at 5-fold dilutions for chloride. All reported sample results appropriately reflected this dilution factor. However, the highest final concentration reported was 30.6 mg/L, which is well within the established calibration range (0.1 mg/L to 50 mg/L). At the request of the validator, the laboratory explained that their most recently established method detection limits (MDLs) were very low, allowing them to dilute all samples 5-fold (thus avoiding potential interferences due to high chloride concentrations and prolonging column life) and still maintain an RL of 2.0 mg/L (see Attachment C). Although dilutions should generally be avoided unless they are necessary to achieve target analyte responses within the calibration range, the chloride responses in all of the 5-fold diluted sample analyses were within the established calibration range and almost all were greater than the specified RL of 2.0 mg/L. Therefore, there is no obvious technical problem with this approach, and no action was taken on this basis.

Sample results for ammonia were correctly transcribed from the raw data; since only direct readings of the final results were documented, no verification of the reported concentrations could be made by the validator.



Sample results were consistently reported to three significant figures. This is not in accordance with past CompuChem policy, which was defined as follows: up to three significant figures are reported for positive sample results PROVIDED that no more decimal places than are found in the applicable RL (which is established to a certain number of significant figures and decimal places based on statistical evaluations performed when it is established) are reported, or current CompuChem policy, which simply states that values greater than 10 are reported to three significant figures and values less than 10 are reported to two significant figures. For consistency with historical data generated in support of this project, all results greater than or equal to 10 mg/L were adjusted to reflect three significant figures and values less than 10 mg/L (including RLs) were adjusted to reflect two significant figures. Specifically, the following actions were taken:

- The positive results for ammonia in GW07PB, GW03PB, GW04PB, GW05PB, GW06PB, and GW02PB and for TSS in GW08PB were rounded to reflect two significant figures because each value is less than 10 mg/L and was reported to three significant figures by the laboratory.
- The RLs for TSS, ammonia, and chloride were rounded to reflect two significant figures (instead of three as reported by the laboratory).

The data tables in Attachment A list all individual sample analyte results, whether or not the value or qualifier was changed as a result of the validation effort.

IX. Documentation

Two chain of custody (COC) records were present in the data package and included all reported samples. The following issues were noted:

- Improper corrections were observed. To preserve the integrity of these documents, all necessary corrections must be made by drawing a single line through the incorrect entry, inserting the correct information, and initialing and dating the change.
 Obliterations, unsigned cross-outs, and "write-overs" are not legally defensible
- Copies of courier airbills were not included in the data package to document the shipment portion of the sample transfers. Airbill numbers, however, were documented on both COC records.
- Although this approach is specified by the Quality Assurance Project Plan (QAPP), additional sample volumes provided to facilitate the laboratory's analysis of an MS/MSD pair should not be recorded on the COC as separate samples. Instead, a notation should be made indicating the sample for which extra volume has been provided, with the instruction that this sample be used for the MS/MSD analysis.



MS/MSD analyses are <u>laboratory-initiated quality control</u>; if not for the logistical need to provide sufficient volume for the multiple analyses involved, MS/MSD pairs would never be mentioned on COC documentation. Note that this situation (i.e., the need to provide extra sample containers for QC analyses) is unique to water samples.

True values for chloride in the ion chromatography ICV and CCV standards were not documented in the data package. At the request of the validator, these values were provided via facsimile on 8/28/02 (ICV - 40 mg/L; CCV - 25 mg/L) by the laboratory (see Attachment C).

A revised Form I for GW07PB, showing the corrected TSS concentration (see Section VIII) was provided by the laboratory via facsimile on 8/28/02. This document was page-numbered by the validator and inserted into the data package as page 8, replacing the originally provided page. In addition, the final result for GW07PB on the TSS worksheet (page 76 of the data package) was corrected by the validator to 96.4 mg/L (from 48.2 mg/L).

For ammonia, absorbance readings are provided for the initial calibration standards but only direct readings of the final results were documented in the raw data for all runs performed during the sample analysis series. Therefore, no verification of the concentrations reported for these analyses could be made by the validator. At the discretion of the data user, the laboratory may be requested to provide this documentation in future data packages prepared in support of this project.

A receiving log for COD was provided by the laboratory via facsimile on 8/27/02. This document was page-numbered by the validator and inserted into the data package by the validator as page 80a.

Most of these documentation issues do not directly affect the technical validity of the data generated for these samples, however some of them could be problematic if the data were to be used in litigation.

X. Overall Assessment

Sample results for the three wet chemistry parameters were qualified or corrected as follows based on the validation effort:

- Results for chloride in GW08PB, GW08DPPB, GW07PB, GW03PB, GW04PB, GW05PB, GW06PB, GW02PB, and GW01PB were qualified as less than the reported values based on associated field blank contamination and as estimated based on unacceptably low matrix spike recoveries for this parameter (UJ).
- The result for chloride in GW09FBPB was qualified as estimated (J) based on unacceptably low matrix spike recoveries for this parameter.



- Results for TSS in GW08PB, GW01DPPB, GW07PB, GW03PB, GW04PB, GW05PB, GW06PB, GW02PB, and GW01PB were qualified as estimated (J) based on poor reproducibility in the field duplicate analyses.
- The positive results for ammonia in GW07PB, GW03PB, GW04PB, GW05PB, GW06PB, and GW02PB and for TSS in GW08PB were rounded to reflect two significant figures because each value is less than 10 mg/L and was reported to three significant figures by the laboratory.
- The RLs for ammonia, chloride, and TSS were rounded to reflect two significant figures (instead of three as reported by the laboratory).

Documentation issues are discussed in Section IX.

This validation report should be considered <u>part of the data package</u> for all future distributions of the wet chemistry data.



ATTACHMENT A

DATA TABLES

Wet Chemistry -SDG #RS1067 June 2002 Sample Collections - Marion Bragg Landfill

Marion Bragg Landfill - December 2001 - Wet Chemistry Parameters in Ground Water

Results are in mg/L

Collection Point ====>> Sample ID ===>> Lab Sample No. ====>> Collection Date. ===>> RL		MB-1	MB-1D	MB-2	MB-5	MB-6	MB-7	MB-8
		GW08PB	GW08DPPB	GW07PB	GW03PB	GW04PB	GW05PB	GW06PB
		RS1067-8	RS1067-9	RS1067-7	RS1067-3	RS1067-4	RS1067-5	RS1067-6
		6/13/02	6/13/02	6/13/02	6/13/02	6/13/02	6/13/02	6/13/02
Ammonia Chloride Total Suspended Solids	0.10	0.10 U	0.10 U	6.9	0.55	4.7	6.1	7.0
	2.0	23.8 UJ	23.9 UJ	11.4 UJ	21.5 UJ	14.8 UJ	26.7 UJ	30.6 UJ
	1.0	9.6 J	13.0 J	96.4 J	30.0 J	288 J	260 J	951 J

Marion Bragg Landfill - December 2001 - Wet Chemistry Parameters in Ground Water

Kesults are in mg/L	,		· · · · · · · · · · · · · · · · · · ·	
Collection Point ======	===>	MB-9	MB-10	Field Blank
Sample ID	====>	GW02PB	GW01PB	GW09FBPB
Lab Sample No. ======	===>	RS1067-2	RS1067-1	RS1067-10
Collection Date.	6/13/02	6/13/02	6/13/02	
	RL			
Ammonia	0.10	0.46	0.10 U	0.10 U
Chloride	2.0	12.7 UJ	22.7 UJ	6.9 J
Total Suspended Solids	1.0	110 J	107 J	1.0 U



ATTACHMENT B

CLASSICAL CHEMISTRY ANALYSES DATA SHEETS (Form Is)

Wet Chemistry -SDG #RS1067
June 2002 Sample Collections - Marion Bragg Landfill

1-CC

CLASSICAL CHEMISTRY ANALYSES DATA SHEET

EPA SAMPLE NO.

6/18/02

6/17/02

							 	
Lab Name:	CompuChem	Contract:				GW0	MB-11	
	LIBRTY	Case No.:	NRAS No.:			(088/20/02		
SDG No.:	RS1067							
Matrix (so:	il/water): WATER		La	b Sam	ple I	D: RS1067-8		
Date Recei	ved: 6/14/02		8	Solid	.s: 0	. 00		
	Concentration	n Units (mg/L or mg/kg dry v	veight	t):	mg,	/L		
	PARAMETER	CONCENTRATION	С	Q	М	DATE ANALYZED		
	TSS	1 9.6 9.60	J			6/18/02	ĺ	

Chloride

Ammonia

Carrikson 8/29/02

Comments: 10

1-CC

CLASSICAL CHEMISTRY ANALYSES DATA SHEET

EPA SAMPLE NO.

Lab Name:	CompuChem	Contract:				GW0	MB-IA
Lab Code: LIBRTY		Case No.:	NRAS No.:				Ca 28/2
SDG No.:	RS1067						
Matrix (so	oil/water): WATE	R	Lal	Sam	ple I	D: RS1067-	9
Date Recei	ved: 6/14/02	_	8 5	Solid	s : 0	.00	
	Concentratio	on Units (mg/L or mg/kg dry v	veight):	mg	/L	
	PARAMETER	CONCENTRATION	С	Q	м	DATE ANALYZED	
	TSS	13.0	3		1	6/18/02	7
	Chloride	23.9	UJ			6/18/02]
	Ammonia	1 010 -0.100	บ			6/17/02	

Ca88/29/08

Comments:		
	9	

1-CC

CLASSICAL CHEMISTRY ANALYSES DATA SHEET

EPA SAMPLE NO.

•	Lab Name:	CompuChem	Contract:			MB-2 Caes/20102	
							19901-0102
	Lab Code:	LIBRTY	Case No.:	NRAS No.:			Cac 8/34/00
	SDG No.:	RS1067					
_	Matrix (so	il/water): WATER		Lab	Sample I	D: RS1067-7	
	Date Recei	ved: 6/14/02		₹ So	lids: 0	.00	
		Concentration Uni	its (mg/L or mg/kg dry	weight):	: ng	/L	
			1			DATE	
		PARAMETER	CONCENTRATION	<u> </u>	ОМ	ANALYZED	
		Chloride	11.4	ILJI		6/18/02	
		TSS	96.4			6/18/02	
		Ammonia	1 69 5 54	1		6/17/02	

Ca E 8/24/07

Comments: Cats/38/08

1-CC

CLASSICAL CHEMISTRY ANALYSES DATA SHEET

EPA SAMPLE NO.

6/18/02

6/17/02

Lab Name: C	ompuChem	Contract:		GW03P	B MB-5		
Lab Code: <u>L</u>	IBRTY	Case No.:		NRAS No.:	Ca8 8/24/08		
SDG No.: R	S1067				2		
Matrix (soil	/water): WATER		Lab Sample	⊇ ID: RS1067-3			
Date Receive	d: 6/14/02		% Solids:	0.00			
	Concentration U	nits (mg/L or mg/kg dry wei	jht):	mg/L	2 3		
	PARAMETER	CONCENTRATION	: Q 1	DATE M ANALYZED			
	Chloride	1 21.5 1.4	7	6/18/02	3		

TSS

Ammonia

0.55 0.548 | COE 8/24/03

Comments:

SW-846

1-CC

CLASSICAL CHEMISTRY ANALYSES DATA SHEET

EPA SAMPLE NO.

6/17/02

Lab Name:	CompuChem	Contract:			GW04PB			
Lab Code:	LIBRTY	Case No.:		NRAS No.:	caeglaglo			
Lab Code:	LIBRII	case No		MAS NO	0			
SDG No.:	RS1067							
Matrix (so	il/water): WATER		Lab Samp	ole ID: RS10	67-4			
Date Recei	ved: 6/14/02		% Solids	0.00				
	Concentration Un	nits (mg/L or mg/kg dry we	eight):	mg/L				
				DATE				
	PARAMETER	CONCENTRATION	c Q	M ANALY	ZED			
	Chloride	14.8	UJ	6/18/	02			
	TSS	288	T	6/18/	02			

Ammonia

COE 8/20/02

1-CC

CLASSICAL CHEMISTRY ANALYSES DATA SHEET

EPA SAMPLE NO.

Lab Name:	CompuChem			Contract:				CW0	^{5PB} MB-7
	LIBRTY		Case	No.:			NRA	S No.:	Ø
SDG No.:	RS1067								
Matrix (soi	.1/water):	WATER			Lal	o Sam	ple II	D: RS1067-5	
Date Receiv	red: 6/14/0	2			8s :	Solıd	s: 0.	. 00	
	Concen	tration Un	its (mg/	L or mg/kg dry	weight	:):	mg/	/L	
	PARAMETI	ER		CONCENTRATION	С	Q	М	DATE ANALYZED	l
	Chloride)		26.7	IUJ			6/18/02]
	TSS	_		260	I J			6/18/02	1

Ammonia

cat 8/29/02

Comments:

1-CC

CLASSICAL CHEMISTRY ANALYSES DATA SHEET

EPA SAMPLE NO.

6/18/02

6/18/02

6/17/02

Lab Name:	CompuChem		Contract:				GW 0	MB-8
Lab Code:	LIBRTY		Case No.:		_	NRA	S No.:	(088/2
SDG No.:	RS1067	-						
Matrix (so	il/water):	WATER		La	b Sam	ple I	D: RS1067-6	5
Date Recei	ved: 6/14/02			f	Solid	s: 0	.00	
	Concent	ration Units	(mg/L or mg/kg dry	weight	t):	mg,	<u>/L</u>	
	PARAMETER	l.	CONCENTRATION	С	Q	м	DATE ANALYZED]

Chloride

Ammonia

TSS

7.0 -6.96 | COE 8/24/02

30.6 | UJ

951 | J

Comments:

1-CC

CLASSICAL CHEMISTRY ANALYSES DATA SHEET

EPA SAMPLE NO.

Lab Name: CompuChem	Contract:	GW02PB MB-9	; ;
Lab Code: LIBRTY	Case No.:	NRAS No.: CAE 8/)	alor
SDG No.: RS1067			•4
Matrix (soil/water): WATER		Lab Sample ID: RS1067-2	
Date Received: 6/14/02		% Solids: 0.00	,

Concentration Units (mg/L or mg/kg dry weight): mg/L

PARAMETER	CONCENTRATION	С	Q	м	DATE ANALYZED
Chloride	12.7	WJ			6/18/02
TSS	110	J			6/18/02
Ammonia	1 0.46 0.463				6/17/02

CaE 8/29/02

Comments: 3

1-CC

CLASSICAL CHEMISTRY ANALYSES DATA SHEET

EPA SAMPLE NO.

Lab Name:	CompuChem	Contract:	GW01PB MB-10
Lab Code:	LIBRTY	Case No.:	NRAS No.: CAE
SDG No.:	RS1067		8/34/0
Matrix (sc	oil/water): WATER		Lab Sample ID: RS1067-1
Date Recei	.ved: 6/14/02		% Solids: 0.00

Concentration Units (mg/L or mg/kg dry weight):

mg/L

PARAMETER	CONCENTRATION	C	Q	м	DATE ANALYZED
Chloride	22.7	UJ			6/18/02
TSS	107	J			6/18/02
Ammonia	1 0.10 -0.100	U			6/17/02

CRE8/29/02

Comments:

1-CC

CLASSICAL CHEMISTRY ANALYSES DATA SHEET

EPA SAMPLE NO.

Lab Name: CompuCho	em.	Contract:		GWO9FBPB Geld Black
Lab Code: LIBRTY	Cas	se No.:	NRAS No.:	Ca48/24/0x
SDG No.: RS1067				·
Matrix (soil/water): WATER		Lab Sample ID: RS10	067-10
Date Received: 6/	14/02		% Solids: 0.00	
Cor	ncentration Units (mo	J/L or mg/kg dry we:	ight): mg/L	

PARAMETER	CONCENTRATION	c_	Q	M	DATE ANALYZED
TSS	1 1.0 1.00	υ			6/18/02
Chloride	1 0.9 6.86 1	\mathcal{F}			6/18/02
Ammonia	0.100-100	U			6/17/02

COE 8/29/02

Comments:



ATTACHMENT C

LABORATORY RESPONSES TO VALIDATOR INQUIRIES

Wet Chemistry -SDG #RS1067 June 2002 Sample Collections - Marion Bragg Landfill August 28, 2002

In response to the inquiry for SDG RS1067:

The true values for the chloride analysis are as follows: ICV TV = 40.0 mg/L, CCV TV = 25.0 mg/L.

The TSS results were reviewed and there was one result found to have been reported incorrectly. That sample was RS1067-7 (client ID GW07PB). The corrected form has been attached.

It is correct that all samples on the IC that were analyzed for chloride were diluted by a factor of five. The MDLs were recently reanalyzed, and when calculated, were at a low enough level to allow the dilution of samples by a factor of five and still maintain the same reporting limit of 2.0 mg/L. This has been initiated to help eliminate interference and to prolong the column life.

Environmental Analytical Services



Diane Byrd Compuchem 501 Madison Ave. Cary, NC 27513 A. Link Thrower
Chemical and Environmental Technology
(CET)
P.O. Box 12298
Research Triangle Park, NC
27709
Phone- (919) 467-3090 Fax - (919) 467-3515

June 27, 2002

Dear Diane:

Enclosed is the report for 10 water samples submitted to Chemical and Environmental Technology on June 14, 2002 for COD analysis. The samples were collected on June 13, 2002 and were analyzed within the required holding time.

All quality control parameters were within limits.

Sincerely.

A. Link Thrower

Laboratory Director - CET

ENVIRONMENTAL ANALYTICAL SERVICES

FINAL REPORT OF ANALYSES

COMPUCHEM
Attn: DIANE BYRD
501 MADISON AVENUE
CARY, NC 27513-

REPORT DATE: 06/27/02

SAMPLE MATRIX- GW

RECEIVED BY- ALT

TIME SAMPLED- 0805

SAMPLE NUMBER- 197890 SAMPLE ID- GW01PB

DATE SAMPLED- 06/13/02

DATE RECEIVED- 06/14/02 SAMPLER- NOT SPECIFIED

TIME RECEIVED- 1430

DELIVERED BY- CHRIS BRAND

Page 1 of 1

PROJECT NAME : MARION BRAGG

ANALYSIS

ANALYSIS METHOD DATE BY RESULT UNITS PQL

PQL = Practical Quantitation Limit

Results followed by the letter J are estimated concentrations.

NC DENR CERTIFICATIONS: DWQ - 96; PUBLIC WATER SUPPLY - 37724

ENVIRONMENTAL ANALYTICAL SERVICES

FINAL REPORT OF ANALYSES

COMPUCHEM Attn: DIANE BYRD 501 MADISON AVENUE CARY, NC 27513-

REPORT DATE: 06/27/02

SAMPLE NUMBER- 197891 SAMPLE ID- GW02PB

DATE SAMPLED- 06/13/02

TIME RECEIVED- 1430

DATE RECEIVED- 06/14/02 SAMPLER- NOT SPECIFIED DELIVERED BY- CHRIS BRAND

Page 1 of 1

PROJECT NAME : MARION BRAGG

ANALYSIS

ANALYSIS

METHOD DATE BY

RESULT UNITS

POL

SAMPLE MATRIX- GW TIME SAMPLED- 0835

RECEIVED BY- ALT

CHEMICAL OXYGEN DEMAND

EPA 410.4 06/17/02 JMB

28 mg/L

10

PQL = Practical Quantitation Limit

Results followed by the letter J are estimated concentrations.

NC DENR CERTIFICATIONS: DWQ - 96; PUBLIC WATER SUPPLY - 37724

ENVIRONMENTAL ANALYTICAL SERVICES

FINAL REPORT OF ANALYSES

COMPUCHEM Attn: DIANE BYRD 501 MADISON AVENUE CARY, NC 27513-

REPORT DATE: 06/27/02

SAMPLE NUMBER- 197892 SAMPLE ID- GW03PB

DATE SAMPLED- 06/13/02

DATE RECEIVED- 06/14/02 SAMPLER- NOT SPECIFIED

TIME RECEIVED- 1430 DELIVERED BY- CHRIS BRAND

SAMPLE MATRIX- GW TIME SAMPLED- 0935

RECEIVED BY- ALT

Page 1 of 1

PROJECT NAME : MARION BRAGG

ANALYSIS

ANALYSIS

METHOD DATE BY RESULT UNITS PQL

CHEMICAL OXYGEN DEMAND

EPA 410.4 06/17/02 JMB

30 mg/L

10

PQL = Practical Quantitation Limit

Results followed by the letter J are estimated concentrations.

NC DENR CERTIFICATIONS: DWQ - 96; PUBLIC WATER SUPPLY - 37724

ENVIRONMENTAL ANALYTICAL SERVICES

FINAL REPORT OF ANALYSES

COMPUCHEM
Attn: DIANE BYRD
501 MADISON AVENUE
CARY, NC 27513-

REPORT DATE: 06/27/02

SAMPLE NUMBER- 197893 SAMPLE ID- GW04PB

DATE SAMPLED- 06/13/02

SAMPLE MATRIX- GW TIME SAMPLED- 1000 RECEIVED BY- ALT

DATE RECEIVED- 06/14/02 SAMPLER- NOT SPECIFIED TIME RECEIVED- 1430 DELIVERED BY- CHRIS BRAND

Page 1 of 1

PROJECT NAME : MARION BRAGG

ANALYSIS

ANALYSIS METHOD

DATE BY

RESULT UNITS

PQL

CHEMICAL OXYGEN DEMAND

EPA 410.4 06/17/02 JMB

41 mg/L

10

PQL = Practical Quantitation Limit

Results followed by the letter J are estimated concentrations.

NC DENR CERTIFICATIONS: DWQ - 96; PUBLIC WATER SUPPLY - 37724

ENVIRONMENTAL ANALYTICAL SERVICES

FINAL REPORT OF ANALYSES

COMPUCHEM
Attn: DIANE BYRD
501 MADISON AVENUE
CARY, NC 27513-

REPORT DATE: 06/27/02

SAMPLE NUMBER- 197894 SAMPLE ID- GW05PB

DATE SAMPLED- 06/13/02

TIME RECEIVED- 1430

DATE RECEIVED- 06/14/02 SAMPLER- NOT SPECIFIED

DELIVERED BY- CHRIS BRAND

Page 1 of 1

PROJECT NAME : MARION BRAGG

ANALYSIS

ANALYSIS METH

METHOD DATE

BY RESULT UNITS

PQL

SAMPLE MATRIX- GW

RECEIVED BY- ALT

TIME SAMPLED- 1020

CHEMICAL OXYGEN DEMAND

EPA 410.4 06/17/02 JMB

26 mg/L

10

PQL = Practical Quantitation Limit

Results followed by the letter J are estimated concentrations.

NC DENR CERTIFICATIONS: DWQ - 96; PUBLIC WATER SUPPLY - 37724

ENVIRONMENTAL ANALYTICAL SERVICES

FINAL REPORT OF ANALYSES

COMPUCHEM

Attn: DIANE BYRD 501 MADISON AVENUE CARY, NC 27513-

REPORT DATE: 06/27/02

SAMPLE NUMBER- 197895 SAMPLE ID- GW06PB

DATE SAMPLED- 06/13/02

DATE RECEIVED- 06/14/02 SAMPLER- NOT SPECIFIED

TIME RECEIVED- 1430 DELIVERED BY- CHRIS BRAND

Page 1 of 1

PROJECT NAME : MARION BRAGG

ANALYSIS

ANALYSIS

METHOD

DATE

BY RESULT UNITS

PQL

SAMPLE MATRIX- GW

TIME SAMPLED- 0905 RECEIVED BY- ALT

CHEMICAL OXYGEN DEMAND

EPA 410.4 06/17/02 JMB

111 mg/L

10

PQL = Practical Quantitation Limit

Results followed by the letter J are estimated concentrations.

NC DENR CERTIFICATIONS: DWQ - 96; PUBLIC WATER SUPPLY - 37724

ENVIRONMENTAL ANALYTICAL SERVICES

FINAL REPORT OF ANALYSES

COMPUCHEM
Attn: DIANE BYRD
501 MADISON AVENUE
CARY, NC 27513-

REPORT DATE: 06/27/02

SAMPLE NUMBER- 197896 SAMPLE ID- GW07PB

DATE SAMPLED- 06/13/02

DATE RECEIVED- 06/14/02 SAMPLER- NOT SPECIFIED
TIME RECEIVED- 1430 DELIVERED BY- CHRIS BRAND

Page 1 of 1

PROJECT NAME : MARION BRAGG

ANALYSIS MET

METHOD

DATE BY RESULT UNITS

PQL

SAMPLE MATRIX- GW TIME SAMPLED- 1045

RECEIVED BY- ALT

CHEMICAL OXYGEN DEMAND

EPA 410.4 06/17/02 JMB

ANALYSIS

28 mg/L

10

PQL = Practical Quantitation Limit

Results followed by the letter J are estimated concentrations.

NC DENR CERTIFICATIONS: DWQ - 96; PUBLIC WATER SUPPLY - 37724

LABORATORY DIRECTOR

ENVIRONMENTAL ANALYTICAL SERVICES

FINAL REPORT OF ANALYSES

COMPUCHEM

Attn: DIAME BYRD 501 MADISON AVENUE CARY, NC 27513-

REPORT DATE: 06/27/02

SAMPLE NUMBER- 197897 SAMPLE ID- GW08PB

SAMPLE MATRIX- GW TIME SAMPLED- 1130

DATE SAMPLED- 06/13/02

DATE RECEIVED- 06/14/02 SAMPLER- NOT SPECIFIED

RECEIVED BY- ALT

TIME RECEIVED- 1430

DELIVERED BY- CHRIS BRAND

Page 1 of 1

PROJECT NAME : MARION BRAGG

ANALYSIS

DATE

ANALYSIS

METHOD

RESULT UNITS BY

PQL

CHEMICAL OXYGEN DEMAND

EPA 410.4 06/17/02 JMB

<10 mg/L

10

PQL = Practical Quantitation Limit

Results followed by the letter J are estimated concentrations.

NC DENR CERTIFICATIONS: DWQ - 96; PUBLIC WATER SUPPLY - 37724

ENVIRONMENTAL ANALYTICAL SERVICES

FINAL REPORT OF ANALYSES

COMPUCHEM

Attn: DIANE BYRD 501 MADISON AVENUE CARY, NC 27513-

REPORT DATE: 06/27/02

SAMPLE NUMBER- 197898 SAMPLE ID- GW08DPPB

DATE SAMPLED- 06/13/02

DATE RECEIVED- 06/14/02 SAMPLER- NOT SPECIFIED

TIME RECEIVED- 1430 DELIVERED BY- CHRIS BRAND

SAMPLE MATRIX- GW TIME SAMPLED- 1130 RECEIVED BY- ALT

Page 1 of 1

PROJECT NAME : MARION BRAGG

ANALYSIS

ANALYSIS

METHOD DATE BY RESULT UNITS

CHEMICAL OXYGEN DEMAND

EPA 410.4 06/17/02 JMB

10 mg/L

10

POL

PQL = Practical Quantitation Limit

Results followed by the letter J are estimated concentrations.

NC DENR CERTIFICATIONS: DWQ - 96; PUBLIC WATER SUPPLY - 37724

ENVIRONMENTAL ANALYTICAL SERVICES

FINAL REPORT OF ANALYSES

COMPUCHEM
Attn: DIANE BYRD
501 MADISON AVENUE
CARY, NC 27513-

REPORT DATE: 06/27/02

SAMPLE NUMBER- 197899 SAMPLE ID- GW09FBPB

DATE SAMPLED- 06/13/02

DATE RECEIVED- 06/14/02 SAMPLER- NOT SPECIFIED

TIME RECEIVED- 1430

DELIVERED BY- CHRIS BRAND

Page 1 of 1

PROJECT NAME : MARION BRAGG

ANALYSIS

ANALYSIS

METHOD

DATE

BY RESULT UNITS

PQL

SAMPLE MATRIX- GW

TIME SAMPLED- 1035 RECEIVED BY- ALT

CHEMICAL OXYGEN DEMAND

EPA 410.4 06/17/02 JMB

<10 mg/L

10

PQL = Practical Quantitation Limit

Results followed by the letter J are estimated concentrations.

NC DENR CERTIFICATIONS: DWQ - 96; PUBLIC WATER SUPPLY - 37724

COMPUCHEM	Projec	t Name:			RACT				ed to: 2				Comi	puChem poin	it-of-contact: (4) DIRNY BYKL
a division of Liberty Analytical Corp.		MAKI	un (3899	C		Contac								• /
	TAT:	1	<u>'</u>	- 1507	- }		Addres						Phon	ie: (919) 379	-4100 X 4089
		/	3										Fax:	(919) 379	703 0
501 Madison Avenue	Repor	style	1.1.	<u></u>	chas		51	· · · ·						nling complet	e? Y or N (see Note 1)
Cary, NC 27513		<u>ااں-</u>	CV7 IV9	Y A	CVIA	, 	Phone:		(atata)						PS) or Batch (B) QC?
1-800-833-5097 BOX #1 1. Surface Water 6. T	rip Blank	equireme	ent:	IBAV #5	A. HCI		Project	e Only	(state)	I D	OX #3		BOX		BOX #5
2. Ground Water 7. C	-	^		BUX #2	B. HNO			ther		, P.	F- Filte	red	BOA	H- High	C-CLP T-TCLP
	Vaste					03 - 106 DH + 1ce		aHSO4			U- Unfi			M- Medium	s- SW-846
4. Rinsate 9. C	Other				D. H ₂ S	O ₄ + Jce	e I. Zr	Ac+NaC						L- Low	W- CWA 600-series
5. Soil / Sediment / Slud	ige	,	1 =	ļ			d J. M			ــــــــــــــــــــــــــــــــــــــ	5445				O- Other
	١,,		Box #1	Box #2	Box #3	Box #4	Box #5		}	PA	RAMET	ERS	İ		
	N]	}	iltered / Unfiltered										
	Year		}		life	ouc.			8 _						Remarks / Comments
Sample ID	ä			Į <u>₹</u>	5	ŭ		es	de G	0					(see Notes 2 & 3)
	😤			Š	%	tec	g	Ħ,	ا يو	<i>(: (</i>		Ì			(See Notes 2 & 3)
	Date /	Time	Matrix	Preservative	le le	Expected Conc.	Method	of Bottles	Use for Lab QC (MS or DUP)		1 1	Í		CCN	
Cisol PA	6/13	CS OF	1	-	i i i	<u> </u>		#	<u> 35</u>	7		_	DT	1667-1	197890
C(\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	1//	1			 			1	-	/	+	$\neg \dagger$	- 1011		
G 63 0 2 1 15	17-	C8: 35		ļ	-				ļ	_				2	91
C WO370		05:35						1						1 3	92
CW017B CW037B CW037B		10:00						1						4	93
1/3/DOSTB		12.20						1						5	94
GWOLPB		U Rics						i						6	95
GWOTPB		10:4)						1		7				7	٢,
GWOLPB GWORPB GWORPB		1130						3	*	7				8	17
CWD8D77B		11:30	,					İ		7				9	98
GW09 FBPB	1	10:35	i/					1		1				10	
Clients Special Instructions:		1.02	V	<u></u>	ll-				I				L	· · · · · · · · · · · · · · · · · · ·	Temperature _ 2 . 5 °C
Lab: Received in good conditi	ion? Y	gr N	Descr	ibe any	problem	s:							·		
#1 Relinquished by:(sig) Zudoe		Ever	7 .	7 ./	#2 Relinq		VISION OF				Date 6/	-4/ R	elinquishe	ed by:(sig)	Date:
Company Name:	Sun	'	Time: 5	115	Company	Name:		15			ime:2:	3 ∵ c	ompany N	lame:	Time:
#1 Received by:(sig)	12		Date:	i plas	#2 Receiv	ed by (s	ig) C	1.1.	1		Date: 6.1	# غرب	2 Receive	d by:(sig)	Date:
Company Name:	51		Time:	2:15	Company	Name:	(CEX	<u>-</u>	Т	ime:14.	7 O C	ompany N	lame:	Time:

Note (1) If "N" lab should batch samples to await remainder of project - maximizing batch size and minimizing QC ratio, if "Y" lab should begin processing batches now Note (2) Samples should be stored 60 days after date report mailed at no extra charge.

Note (3) All lab copies of data should be retained for a minimum of 3 years

Note (4) Please call point-of-contact to verify receipt of samples

COD WATER/WASTEWATER METHOD EPA 410.4

LIMS BATCH #-SAMPLE TYPE

į;

DATE: 4/1/02 TIM3: 1004

268324-WW 268325-CW

ANALYST: jmb

REFERENCE CURVE DATE: 4/04/02

DIGESTION TIME: 1127 TO 1327

Batch #	Sample #	Dilution	Volume (mL)	Absorbance @ 600 nm	Result (mg/L)	% Recovery/ RAPD	CurveRange (Low/High)
	Blk	_	2	0.000			70W
	CKSH 75 2			0.034	71/75	95 %	
	1978901	ł 1		0.010	19		
	19784/ 1			0.014	28		
	197892			0.015	30		
	197843	1		0.020	41		
 	197894 .	11		0.013	26		
	197898.	1		0.052)11		
	197894			0.014	28		
	197897			0.002	<10		
	197898	1		0.006	10		
 	147899	1 1		0,000	10		.
	BIK			0.000			H161+
	Childiso		V	0.075	151/10	1019.	

COD WATER/WASTEWATER METHOD EPA 410.4

; ! :

CET INORGANIC ANALYSIS FORM	LIMS BATCH #-SAMPLE TYPE
DATE: 4/17/02	268324 - WW
TIME: 1004	
ANALYST:	
REFERENCE CURVE DATE: 6/64/62	
DIGESTION TIME: 1127 TO 1307	

Batch #	Sample #	Dilution	Volume (mL)	Absorbance @ 600 nm	Result (mg/L)	% Recovery/ RAPD	CurveRange (Low/High)
	CKJH 750 2	_	ري 2	0,344	724/150	9190	1+161+
268324			·	0.042	81		
	1971671)	_	V	0.041	79	RMPD = 2.5	7 1
<i>i'</i>							
		·					
							
 							
					1	1	

ENVIRONMENTAL ANALYTICAL SERVICES

REFERENCES

'astewater Program References (Includes Groundwater and Solids)

"Rules Governing Laboratory Certification" NCAC, Title 15 DENR, Chapter 2H .0800, February 2, 1994 orth Carolina Administrative Code for Wastewater Laboratories

rederal Register, 40 CFR Part 136, July 1, 1998

Metals, Inc rganics, and Organics for groundwater and wastewater sampling, preservation, and analysis

roundwater Section Guidelines for the Investigation and Remediation of Soils and Groundwater, Volumes I and II, May and January নগ98, Respectively

Required Methodology for Groundwater and Soil Remediation and Assessment ST and Non-UST).

Wethod for the Determination of Volatile Petroleum Hydrocarbons (VPH), MADEP, January 1998 √PH Method

ethod for the Determination of Extractable Petroleum Hydrocarbons (EPH), MADEP, January 1998
EPH Method

uidelines for Site Assessment, cleanup, and UST Closure, State of California Leaking UST Task Force, Appendix D, October 1989

2 H Method for TPH GRO and DRO

3W - 846, Third Edition, Final Update III, June 1997

organics and Organics in soil or sludges. Hazardous Waste. TCLP for Solid and Liquid Waste. Metals in soil, sludge, or groundwater. _tetals analyses for NC groundwater compliance are digested by Method 3030C, Standard Methods, 18th Edition.)

Prinking Water Program References

__aboratory Certification" NCAC, Title 15A DHHS, 20D.0200, January 26, 1996

Vorth Carolina Administrative Code for Drinking Water Laboratories

Rules Governing Public Water Systems" DENR, Division of Environmental Health, Public Water Supply Section, October, 1997

inting

North Carolina Administrative Code for required Methods and Sampling for Public Water Systems

ederal Register, 40 CFR Parts 141-143, July 1, 1998

metals, Inorganics, and Organics for drinking water sampling, preservation, and analysis

'Technical Notes on Drinking Water Methods" USEPA, EMSL, EPA-600/R-94-173, October 1994 (NTIS PB95-104766) eneral guidance and notes regarding updates for acceptable methods and practices

Methods for the Determination of Metals in Environmental Samples-Supplement I" SEPA ORD, EPA-600/R-94/111, May 1994 (NTIS PB95-125472)

Methods for the Determination of Organic Compounds in Drinking Water", USEPA, EPA-600/4-88-039, December, 1980, Revised July 1991

Iferences Supporting Wastewater and Drinking Water Programs

'Methods for Chemical Analysis of Water and Wastes", USEPA 'A-600/4-79-020, March 1983

organics and wet chemistry analyses for wastewater, groundwater, and drinking water

'Standard Methods", 18th Edition, 1992

organics, Metals, Organics, Total & Fecal Coliform (and Strep) for groundwater, wastewater, stream samples, and drinking water

*Method 504.1 1,2-Dibromoethane (EDB), 1,2 Dibromo-3-Chloropropane (DBCP), and 1,2,3-trichloropropane (123 TCP) in water by dicroextraction and GC, Rev 1.1 USEPA, ORD 1995 astewater and Drinking Water